

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93uj-7h9w Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0215

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jonathan Griswold

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## General Comment

I urge ATF to finalize its proposed rule clarifying that bump-fire stocks, along with other conversion devices that enable semiautomatic weapons to mimic automatic fire, qualify as machineguns under the National Firearms Act and are generally illegal to possess.

On the night of October 1, 2017, a gunman opened fire from a hotel room on the 32nd floor of the Mandalay Bay hotel into the 22,000 person crowd at the Route 91 Harvest country music festival in Las Vegas, Nevada, killing 58 people and injuring more than 500. The gunman fired more than 1,100 rounds of ammunition in 11 minutes, using semiautomatic rifles modified with dangerous firearm accessories designed to dramatically accelerate the rate of fire, commonly known as bump-fire stocks. These devices are intended to circumvent the restrictions on possession of fully automatic firearms in the Gun Control Act of 1968 and the National Firearms Act of 1934 by allowing an individual to modify a semiautomatic rifle in such a manner that it operates with a similar rate of fire as a fully automatic rifle. Bump stocks and similar conversion devices that accelerate the rate of fire of a semiautomatic firearm are extremely dangerous and pose a substantial risk to public safety.

In the absence of immediate action by Congress, ATF should finalize its proposed rule, clarifying that conversion devices like bump-fire stocks are included in the definition of machinegun under the National Firearms Act of 1934. And then Congress must act as well to ensure that manufacturers cannot continue to endanger public safety by designing devices that imitate machine guns and subvert the law. The continued presence of these dangerous devices puts all of our communities at risk and both Congress and ATF must take action quickly to address this threat.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93uj-nbqd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0216

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Victor Escobar

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93uk-r44x Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0217

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Dan Wicht

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93uk-zhyr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0218

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kayla Stephens

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93uk-h8s3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0219

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Diane Black

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93uk-mtyw Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0220

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Diane Black

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93uk-tgke Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0221

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Alissa Sollitto

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93uk-gfmp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

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**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0222

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Maureen Shea

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## General Comment

I respectfully ask that changes not be made in the present regulations regarding exporting of semi-automatic weapons and ammunition abroad. With all the illegal arms now circulating in the world, the U.S. should be trying to reduce not add new firearms.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93ul-nxfrm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0223

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93ul-hwwp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0224

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** MARGARET M HODSOLL

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## General Comment

I am against transferring International Traffic in Arms Regulations from the State Dept. to the Commerce Dept., nor to I want to see our gun culture spread to other countries.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93ul-fe3b Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0225

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Margaret Hilton

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## General Comment

To: Secretary of State Mike Pompeo  
Secretary of Commerce Wilbur Ross

We urge you to reverse the proposed regulations that would make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere. We have seen the effects of these weapons in U.S. shootings, and know they are used around the world to kill and attack hundreds of people every day in violent crime, wars, and political violence. U.S. export controls for weapons used in violence should be made stronger, not weaker.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93ul-e1li Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0226

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anne Pavlic

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93ul-3kkv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0227

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Barbara Harper

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## General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93ul-19cm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0228

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nancy knipe

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## General Comment

Guns should be regulated by the Department of State, not the Dept of Commerce. This is not a case of commerce, but of the availability of weapons that are only meant to kill other humans at outrageous rates. I believe in more control over firearm sales and distribution. If anything we need to use our resources to curtail the purchase and sale of firearms. Some how we have become the United States of the NRA.

Bumpstocks are another egregious affront to the health and welfare of this country's citizens. BAN THE SALE OF BUMPSTOCKS at the very least.

Thank you.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93um-cybo Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0229

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kim Duncan

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## General Comment

I am writing in strong opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93un-iv42 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0230

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mark Koritz

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93un-8bxo Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0231

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sharon Fetter

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93un-v5vb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0232

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Cinda Johansen

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## General Comment

This is an emergency and all the children of the USA are in danger of being murdered. We all should and must stop the sale of assault weapons, bump stocks and high volume magazines in this country. Amendment rights are not being stepped on and the proof is the amount of guns(all types) compared to the number of people with these weapons is a small part of our population. Please think of our children.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93un-e4yi Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0233

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** James Cunningham

**Organization:** Guitar Instruction

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## General Comment

I am writing in strong opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce. The proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

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Firearms are used to kill thousands of people every day around the world in acts of organized crime, street crime, political violence, terrorism, and myriad human rights violations. They should be subject to more controls, not fewer. Humanity deserves to be free from the threats posed by deranged, greedy, corrupt individuals like those responsible for proposing this absurd change.

Thank you for considering my comments.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93un-i0ea Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0234

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** JL Mulligan

**Organization:** Retired

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## General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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As of: November 29, 2018 Tracking No. 1k2-93uo-qqt3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0235

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Deirdre Henderson

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## General Comment

THIS IS A REALLY BAD! IDEA! MOVING EXPORT LICENSE OVERSIGHT FOR FIREARMS TO THE COMMERCE DEPARTMENT IS A VERY BAD IDEA! ARE YOU ALL CRAZY??? ARE YOU SO AFRAID OF THE NRA THAT YOU DO THEIR BIDDING? DO THEY REALLY OWN YOU? HAVE YOU NO MORAL COURAGE? YOUR MOTHERS WOULD NOT BE PROUD OF YOU!!!

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-93uo-xn63
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0236

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jody Gibson

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## General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer."

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93uo-5kvb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0237

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Barbara Olson

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## General Comment

Semiautomatic weapons are weapons for the military and should be carefully controlled. How many mass shootings are we to endure while the NRA profits from the deaths of innocent people here?

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93uo-8m1y Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0238

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Donna Leslie-Dennis

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93uo-185d Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0239

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jeffrey Starr

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93up-s2ve Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0240

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Celeste Hong

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93up-8mdd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0241

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Becca Greenstein

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93up-nwwh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0242

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Marilyn Thompson

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93up-dylg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0243

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** William Kingston

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93up-ezlj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0244

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jon Berg

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93uq-8u6q Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0245

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Karen Dryer

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## General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93uq-5jj6 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0246

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Paul West

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93uq-4dfx Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0247

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kevin Rolfes

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93ur-a7h3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0248

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** JeVerna Haynes

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## General Comment

No, no, no! I'm sick of every thing in this country being about making money, instead of about the safety of our people.

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. This should not be a matter for Commerce, and must require Congressional oversight.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93ur-u2tk Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0249

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Irene Vecchio

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## General Comment

I urge ATF to finalize its proposed rule clarifying that bump-fire stocks, along with other conversion devices that enable semiautomatic weapons to mimic automatic fire, qualify as machineguns under the National Firearms Act and are generally illegal to possess.

On the night of October 1, 2017, a gunman opened fire from a hotel room on the 32nd floor of the Mandalay Bay hotel into the 22,000 person crowd at the Route 91 Harvest country music festival in Las Vegas, Nevada, killing 58 people and injuring more than 500. The gunman fired more than 1,100 rounds of ammunition in 11 minutes, using semiautomatic rifles modified with dangerous firearm accessories designed to dramatically accelerate the rate of fire, commonly known as bump-fire stocks. These devices are intended to circumvent the restrictions on possession of fully automatic firearms in the Gun Control Act of 1968 and the National Firearms Act of 1934 by allowing an individual to modify a semiautomatic rifle in such a manner that it operates with a similar rate of fire as a fully automatic rifle. Bump stocks and similar conversion devices that accelerate the rate of fire of a semiautomatic firearm are extremely dangerous and pose a substantial risk to public safety.

In the absence of immediate action by Congress, ATF should finalize its proposed rule, clarifying that conversion devices like bump-fire stocks are included in the definition of machinegun under the National Firearms Act of 1934. And then Congress must act as well to ensure that manufacturers cannot continue to endanger public safety by designing devices that imitate machine guns and subvert the law. The continued presence of these dangerous devices puts all of our communities at risk and both Congress and ATF must take action quickly to address this threat.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93us-c21a Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0250

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nancy Balassi

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93us-1176 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0251

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Richard Bunting

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many \ countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93us-5b52 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0252

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Caitlyn Geist

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93uu-dqzn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0253

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Felicity Figueroa

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93uw-dv70 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0254

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sara Casey

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. Semiautomatic assault rifles are used in many conflicts around the world, most of whose victims are civilians. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93uy-gmhs Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0255

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joanne Grossi

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## General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer."



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93uz-2gfn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0256

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Bebe McCarthy

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v0-71um Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0257

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jill Nicholas

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer."

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v1-i41g Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0258

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** John Wienert

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v2-zfwb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0259

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ellen Jaramillo

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military.

Semiautomatic assault rifles are not sporting or hunting rifles, and not meant for commercial hunting, so they should

not be governed by the Department of Commerce.

U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state

groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

Semiautomatic

assault rifles are used in military settings and therefore these types of firearms export license oversight should remain

with the Department of State.

The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting

on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction,

and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce

export controls. Semiautomatic assault rifles usage by private citizens results in increased crime, violence, family accidents,

and mass murder, and should be subject to more federal government controls, not fewer.

Please do not move export license oversight for firearms from the Department of State to the Department of Commerce.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v2-ntqg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0260

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Christina Banuelos

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v2-592d Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0261

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Julie Maisel

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## General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer."

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v3-tcl1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0262

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Florence Miller

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v4-ynlx Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0263

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Allen Royer

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## General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer." Thank you. Allen Royer



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v4-k6a4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0264

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Heather Calvert

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v4-1b8n Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0265

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military, despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill thousands of people around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer."

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v4-k5qm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0266

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Quincy Scott

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## General Comment

I strongly oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v6-hn4u Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0267

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Linda Shapiro

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v6-2xxu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0268

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Amanda Santmyer

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v6-makd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0269

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kevin Anonymous

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v6-4qgv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0270

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Meghan Blydenburgh

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v6-vtb7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0271

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Michael Hornig

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v8-lf1g Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0272

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Hollye Dexter

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v8-47hr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0273

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sheila Crane

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military.

Such a categorization does not reflect reality. U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Semi-automatic rifles are not appropriate for civilian populations. The Constitution does not guarantee the right to own weapons of mass destruction. The role of government is to protect its citizens and to combat the rise in mass killings of civilians that is directly tied to easy access to semi-automatic weapons.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v8-awkn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0274

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kathleen Silloway

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v8-i6us Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0275

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Troy Dexter

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## General Comment

"I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v8-iiim Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0276

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Krisana Tantivitoon

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode; these weapons are used by state and non-state groups in armed conflicts; and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

With that said, it makes absolutely no sense to change the oversight from the Department of State to the Department of Commerce. Stricter controls are needed, not laxer ones.

Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v8-desd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0277

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jenni Hailer

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v8-8lzt Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0278

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jenna Silverman

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v8-1vbe Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0279

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mindy M.

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v9-165z Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0280

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** John Parker

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## General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v9-o91a Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0281

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** rosalie Paul

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## General Comment

I am writing my strenuous objection to the sale of fire arms to other countries and to the possible shift of fire arms control to a commerce department. We are a nation of killers and it is ridiculous to support that ethic. It's time to get over our passion for fire arms and see that kindness is the path that can take us where we want to go. Thank you. Rosalie Pau

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v9-wjb7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0282

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lucienne Canet

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## General Comment

I am emphatically against the move to push control of gun exports from the State Department to the Commerce Department. I believe this will increase gun exports to Latin America, which will endanger lives, increase migrant traffic to the United States, increase the number of children affected by gun violence in Central American countries, and increase the work and burden of our foster care system and social workers, as well as our local tax burden. I vow to financially and politically support efforts to vote anyone that supports this recent amendment out of congress.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v9-3u8t Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0283

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Cathy rowan

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce. The proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v9-1ztq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0284

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Wendy Anonymous

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v9-zfwd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0285

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

This is a license to flood this country with even more weapons. Having Commerce regulate this is more pandering to the NRA. Haven't enough children been killed?



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v9-phur Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0286

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Julie Small

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## General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer."

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93v9-tai5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0287

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** ELLIOT PLINER

**Organization:** ST

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## General Comment

I urge ATF to finalize its proposed rule clarifying that bump-fire stocks, along with other conversion devices that enable semiautomatic weapons to mimic automatic fire, qualify as machineguns under the National Firearms Act and are generally illegal to possess.

On the night of October 1, 2017, a gunman opened fire from a hotel room on the 32nd floor of the Mandalay Bay hotel into the 22,000 person crowd at the Route 91 Harvest country music festival in Las Vegas, Nevada, killing 58 people and injuring more than 500. The gunman fired more than 1,100 rounds of ammunition in 11 minutes, using semiautomatic rifles modified with dangerous firearm accessories designed to dramatically accelerate the rate of fire, commonly known as bump-fire stocks. These devices are intended to circumvent the restrictions on possession of fully automatic firearms in the Gun Control Act of 1968 and the National Firearms Act of 1934 by allowing an individual to modify a semiautomatic rifle in such a manner that it operates with a similar rate of fire as a fully automatic rifle. Bump stocks and similar conversion devices that accelerate the rate of fire of a semiautomatic firearm are extremely dangerous and pose a substantial risk to public safety.

In the absence of immediate action by Congress, ATF should finalize its proposed rule, clarifying that conversion devices like bump-fire stocks are included in the definition of machinegun under the National Firearms Act of 1934. And then Congress must act as well to ensure that manufacturers cannot continue to endanger public safety by designing devices that imitate machine guns and subvert the law. The continued presence of these dangerous devices puts all of our communities at risk and both Congress and ATF must take action quickly to address this threat.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93vb-8tpj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0288

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ramona Benson

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93vb-8mhe Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0289

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Robert Mutascio

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93vc-2isl Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0290

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Wendy Wheatcroft

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93vd-xmz4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0291

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Edward Wight

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## General Comment

As a pastor concerned about reducing violence in the world, I am writing to oppose moving export license oversight for firearms from the Department of State to the Department of Commerce. The proposed rule change treats semiautomatic assault rifles as non-military, yet such firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to rigorous controls.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93vd-w1pj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0292

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lorraine Demi

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

Thank you, in advance, for saving lives.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93ve-jf7r Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0293

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** William Marsh

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## General Comment

"I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93vf-ugx6 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0294

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Michelle Mitchell

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93vi-f03g Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0295

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rebecca Ward

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93vi-y01u Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0296

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Michelle Hiseley

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer."

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93vi-rbqr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0297

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** STACIE CHARLEBOIS

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93vn-t9mv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0298

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Richard Blanke

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93vp-t511 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0299

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Barbara Baird

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the State Department to the Department of Commerce. The State Department ensures national security including distribution of weapons worldwide. The Department of Commerce promotes trade; national security is not its mission.

The proposed rule change treats semiautomatic assault rifles as non-military which is not factual. It is a fact that U.S. troops routinely use their military rifles in semiautomatic mode. These weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

The proposed rule eliminates Congressional oversight for important gun export deals. It transfers the cost of processing licenses from gun manufacturers to taxpayers. And it enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to enforce export controls adequately.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

To promote national security, it is imperative that the export license oversight for firearms remain within the State Department.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93vp-rg3q Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0300

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ella Robson

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93vq-se80 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0301

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Deborah Klein

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93vs-28vv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0302

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jerry Boren

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93vs-9d10 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0303

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lisa Coney

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93vu-amni Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0304

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Eryn K

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-93vu-v4w9
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0305

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** RL M

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## General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer."

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93vv-dehv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0306

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** CORY ASHLEY

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## General Comment

I STRONGLY SUPPORT THIS PROPOSED RULE CHANGE. I AM A US VETERAN AND I AM ALSO A TYPE 1 FFL. I WANTED TO APPLY FOR A TYPE 7 FFL MANUFACTURES LICENSE. I WAS UNABLE TO DO SO DUE TO THE HEAVY BURDEN OF THE ITAR FEE. THIS FEE DOES NOT AFFECT THE LARGE FIREARMS MANUFACTURES. IT ONLY AFFECTS SMALL BUSINESSES SUCH AS MINE. THERE ARE MANY SMALL FIREARM MANUFACTURES THAT OPERATE WITHOUT PAYING THE ITAR REGISTRATION FEE PUTTING THEMSELVES AT RISK BECAUSE THEY CAN NOT AFFORD IT. I AM ALSO A GUNSMITH. BETWEEN THE ATF REGULATIONS AND THE ITAR REGULATIONS EVERY TIME THAT I TOUCH A FIREARM I PUT MYSELF AT RISK OF RUNNING AFOUL OF THESE NUMEROUS REGULATIONS THAT OFTEN CONTRADICT EACH OTHER. MANY OF THOSE THAT COMMENT TO OPPOSE THIS RULE CHANGE ARE NOT IN THE FIREARMS INDUSTRY AND IN FACT ONLY OPPOSE IT BECAUSE IT DEALS WITH FIREARMS. INNOVATION COMES FROM THE SMALL BUSINESSES. THIS RULE CHANGE WILL HELP SMALL BUSINESSES FLOURISH.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93vw-cj10 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0307

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sarah Stewart

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## General Comment

Please do not export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military.

We are writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

Please do not export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93vx-y0u3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0308

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** B. Laub

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer. Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93vy-9qlx Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0309

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93vz-tm5a Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0310

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Diana Brunswig-Bosso

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## General Comment

"I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer."

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93w0-rvy0 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0311

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** cheryl greene

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military.

This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

All of us have the right to live free of fear, and more guns, especially military-type weapons creates more fear and danger in society.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93w1-s9fr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0312

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Martha Spencer

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

<b>As of:</b> November 29, 2018 <b>Tracking No.</b> 1k2-93w2-e8mw <b>Comments Due:</b> July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0313

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kathy Bradley

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## General Comment

I strongly oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93w5-y1q1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0314

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Cora Kamerman

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93wb-futw Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0315

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Amanda Hauck

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93wb-kbab Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0316

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Annette Dubois

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93wd-j9fd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0317

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kirby MacLaurin

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## General Comment

To: Secretary of State Mike Pompeo

Please reverse the proposed regulations that would weaken end-use controls, enable production of 3D weapons anywhere, make it easier to export semi-automatic weapons and ammunition, and eliminate Congressional oversight of these sales. America is not safer with a heavily armed third world - violence increases in these places, and our borders are flooded with refugees trying to escape the violence. We have also seen the effects of these weapons in U.S. shootings, and know they are used around the world to kill and attack hundreds of people every day in violent crime, wars, and political violence. U.S. export controls for weapons used in violence should be made stronger, not weaker.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93we-vrzb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0318

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jessica Tillery

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## General Comment

I urge you to reverse the proposed regulations that would make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere. We have seen the effects of these weapons in U.S. shootings, and know they are used around the world to kill and attack hundreds of people every day in violent crime, wars, and political violence. U.S. export controls for weapons used in violence should be made stronger, not weaker.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93we-fvc1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0319

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elizabeth Long

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## General Comment

Petition Text:

To: Secretary of State Mike Pompeo

We urge you to reverse the proposed regulations that would make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere. We have seen the effects of these weapons in U.S. shootings, and know they are used around the world to kill and attack hundreds of people every day in violent crime, wars, and political violence. U.S. export controls for weapons used in violence should be made stronger.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93wf-h9f7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0320

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ellen Goren

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93wf-c7pu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0321

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am in full support of this proposed rule, the no-military weapons should be moved to the Commerce Department. the state department should only be in control of the military weapons, for the purpose of national security.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93wg-tl4q Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0322

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Hannah Mykel

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93wg-fnbs Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0323

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nancy Harrelson

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93wg-zb1z Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0324

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ruth Punt

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

Ruth Punt

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93wh-uiq6 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0325

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anne Callies

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must absolutely be subject to more controls, not fewer!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93wh-fb8j Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0326

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jean Davis

**Organization:** none

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. Do we want to encourage the mayhem that we see in the United States in other countries. Do not make it easier for others to have deadly weapons.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93wk-oqoe Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0327

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Gary Patton

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## General Comment

The proposed change in international sales of guns is a transparent effort to boost domestic gun sales during a down market for firearm manufacturers. Making a profit based on the spilling of blood by others is truly despicable.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93wl-rajh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0328

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nanci Kelly

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93wm-4vsv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0329

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Scott Teel

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93wm-15rl Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0330

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Tracy Pressnall

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## General Comment

"I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93wm-knd9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0331

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Marjorie Zlotowitz

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-93wp-wmnf
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0332

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elaine Barden

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## General Comment

"I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93wp-q92r Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0333

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Barbara Koury

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## General Comment

To whom it may concern, I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93wr-thyu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0334

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jade Masterson

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## General Comment

To: Secretary of State Mike Pompeo

We urge you to reverse the proposed regulations that would make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere. We have seen the effects of these weapons in U.S. shootings, and know they are used around the world to kill and attack hundreds of people every day in violent crime, wars, and political violence. U.S. export controls for weapons used in violence should be made stronger, not weaker.

Information Sources:

[1] The Washington Post, The Trump administration wants to make it easier to sell U.S. guns abroad. Heres what you need to know June 4, 2018. [https://www.washingtonpost.com/news/monkey-cage/wp/2018/06/04/the-trump-administration-wants-to-make-it-easier-to-sell-u-s-guns-abroad-heres-what-you-need-to-know/?utm\\_term=.cdb39dd2a669](https://www.washingtonpost.com/news/monkey-cage/wp/2018/06/04/the-trump-administration-wants-to-make-it-easier-to-sell-u-s-guns-abroad-heres-what-you-need-to-know/?utm_term=.cdb39dd2a669)

[2] Salon, U.S. gun industry wants a bigger piece of the worlds arms trade, June 1, 2018. <https://www.salon.com/2018/06/01/u-s-gun-industry-wants-a-bigger-piece-of-the-worlds-arms-trade/>

[3] State Department public comment site: [https://www.regulations.gov/document?D=DOS\\_FRDOC\\_0001-4527](https://www.regulations.gov/document?D=DOS_FRDOC_0001-4527)

Commerce Department public comment site: <https://www.regulations.gov/document?D=BIS-2017-0004-0001>



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93ws-ipk9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0335

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Betty McNiel

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93wt-4ews Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0336

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Caroline Hanna

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## General Comment

"I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93wt-fd2k Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0337

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Diana Bergman

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93wv-z8gl Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0338

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mrs Renee las

**Organization:** goodnewsloancompany7

**Government Agency Type:** State

**Government Agency:** Loan

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## General Comment

Good Day, I am Mrs Renee ,currently living in USA,I am a married woman at the moment with two kids and i was stuck in a financial situation by august 2012 and i needed to refinance and pay my bills for my son medication. I tried seeking loans from various loan firms both private and corporate but never with success,and most banks declined my credit. But as God would have it, i was introduced to a Man of God a private loan lender by a friend named Mr. Roderick and i got a loan sum of \$100,000.00USD and today i am a business owner and my kids are doing well at the moment. So dear,if you must contact any firm with reference to securing a loan with low interest rate of 2% and better repayment plans and schedule,please contact Mr.Jude Shanko he doesnt know that i am doing this but i am so happy now and i decided to let people know more about him, he offers all kinds of loans to both individuals and companies and also i want God to bless him more. You can contact his company through this email:  
goodnewsloancompany7@gmail.com

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93x0-h5z9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0339

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** j dubya

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## General Comment

Small business owners were stifled by ITAR fees; this is the ONLY reason I personally haven't expanded my businesses to include firearms manufacturing. I have no intention of dealing internationally, but I my largest tax as a firearms manufacturer is paid to an agency protecting us from international trade of arms? The tax burden must be shouldered by everyone that is protected instead of attacking the firearms industry. The removal of ITAR fee can equate to a 7500% decrease in taxes to a small business operating on a single FFL!

FFL=\$30/yr ITAR=\$2250/yr

$7500\% \text{ tax decrease} = \text{ITAR} / \text{FFL} * 100$

That is too large of a tax to be shouldered by the firearms industry alone, and the size of that tax paired with the tax burden being placed solely on the firearms industry seemed like a tax created to deter small business from continued operation and a preventative measure deterring new business from starting in this industry. I can say that the only reason I haven't obtained my FFL is because of this unjust tax burden; I refuse to start a firearms manufacture business because of ITAR fees.

# PUBLIC SUBMISSION

<b>As of:</b> November 29, 2018 <b>Tracking No.</b> 1k2-93x1-f0mz <b>Comments Due:</b> July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0340

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** j dubya

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## General Comment

The Firearms Commerce in the United States Annual Statistical Update 2017 by The United States Department of Justice BATFE shows 1,360,023 suppressors owned by American civilians.

I own and use suppressors. I applaud anyone shooting next to me willing to navigate the red tape of suppressor ownership. A close family member that has lost his hearing from hunting since he was 5 could still be living without hearing aids if more of us sportsman had a muffler on the front of our barrels. NO 33 YEAR OLD SHOULD HAVE HEARING AIDS!

Suppressors are common and simple accessories to American gun owners and the fact that suppressor are NOT planned on being removed from the ITAR list is UNACCEPTABLE! No small business should be forced to pay ITAR fees just because that business manufactured one suppressor in a year.

Maybe businesses that want to sell their suppressors internationally should pay ITAR fees.

Maybe every income tax paying individual should pay for these ITAR fees...Every income tax paying individual is being protected from the International Traffic in Arms Regulations (ITAR). Americans are not required to pay extra for police protection just because that American requires more protection from the Police. Firefighters do not collect more taxes from an individual whose house burns down versus someone that needs their cat taken out of a tree. The firearms industry should not be required to pay for the protection of every American citizen; that protection is a burden that every American Citizen should be required to pay.

The bottom line is this:

-IF ITAR taxes are being used to keep citizens safe then we need to have citizens foot the bill.

BUT

-IF ITAR taxes are in place to deter small business owners operating withing the firearms industry then ITAR needs to be removed from the laws of this country.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93x2-jkvn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0341

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Laura Sokoloski

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## General Comment

I oppose the relaxing of rules regarding the export of assault rifles and other arms by U.S. firearm manufacturers, and urge the Commerce and State Departments to oppose these as well. Exporting more arms is not going to help make the world a more peaceful place, especially assault rifles, instead an increased prevalence of firearms simply increases hostilities and leads to more gun related violence and deaths. Exporting an additional 70,000 arms annually will only increase the death toll from 1,000 gun related deaths worldwide every year. This is not something I can support in good conscience.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93x4-8dbi Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0342

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ronald Miller

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93x5-va8x Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0343

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joann Hilton

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## General Comment

"I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93x6-mixc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0344

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sharon Hurn

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93x7-xsz8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0345

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Laurie Martinelli

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93x8-1e24 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0346

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Harlan Ekre

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## General Comment

As a small business only dealing with commercial small arms parts, we welcome the regulatory change. Lumping commercial small arms items into the ITAR regulations creates an onerous and unnecessary financial burden on small businesses in the U.S. who have no connection to military arms or to the export of same.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93x9-ilwm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0347

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Herbert Langston

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## General Comment

Please stop extorting money from gun manufacturers who do not export "weapons of war".

Opponents who are against "attempts to legitimize semiautomatic assault rifles as civilian products" should bear in mind that we have had semiautomatic magazine-fed civilian rifles since 1910 (Winchester Model 10 SLR) and that these were never issued to the military.

The much-maligned AR-15 was released as a civilian-only firearm in 1964. The military didn't adopt it until two years later, by having it modified as a fully-automatic rifle (M-16) that civilians cannot own. The AR-15 is in use by NO military power in the world, and never has been.

Do not be bullied by left-wing extremists who would see this nation completely disarmed for their own political power.

Non-military products are under the scope and purview of the Commerce Department, not the State Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93x9-lzck Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0348

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Philip Kober JD, MD, PhD

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. As a physician, I categorically can state that the harm to human beings is no different between semiautomatic and fully automatic weapons. The energy transferred to the bullet is what is important, along with other characteristics such as yawing of the bullet on impact (tumbling), explosive ammunition, and other such characteristics. The only difference between an automatic weapon and a semiautomatic weapon is that the automatic continues to fire simply by holding the trigger down, whereas the trigger must be pulled for each shot for the semiautomatic. The rest of the mechanical actions involved are the same. They both have high velocity, and characteristics of the ammunition that make them deadly to many, many people over a short period of time. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. All of these provisions are DEADLY, and should not be adopted.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93xa-8nli Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0349

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Arthur Laudenslager

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## General Comment

I support loosening of ITAR to the maximum extent possible.

The intent of ITAR was to keep technological superiority on the side of US forces, and out of the hands of our enemies, and that is a noble goal. However, when our own "military assistance" programs give those same items, such as night vision, select fire M-4 carbines, and ceramic armor away to extremely unreliable "allies" such as Iraq, and we see them show up shortly thereafter in enemy hands, it makes one wonder what exactly the point of imposing these ridiculous restrictions on small business gunsmiths and the like could possibly be.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93xa-m6nx Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0350

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Coop Cooper

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## General Comment

We urge you to reverse the proposed regulations that would make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere. We have seen the effects of these weapons in U.S. shootings, and know they are used around the world to kill and attack hundreds of people every day in violent crime, wars, and political violence. U.S. export controls for weapons used in violence should be made stronger, not weaker.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93xa-y3b3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0351

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Robert Fulford

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## General Comment

America is the last free country in the world...take the chains off of our manufacturers.... I agree with the new proposed rule change.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93xa-ego5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0352

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Matt Newburn

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## General Comment

The ITAR regs are useless infringement on Americans rights.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93xa-ffc2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0353

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Paul Current

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## General Comment

I support the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This will help small businesses, improve the economy, and mitigate one of the many infringements of our 2nd amendment rights.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93xa-dl3v Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0354

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Carol Landale

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because, amongst other things, the proposed rule change treats semiautomatic assault rifles as non-military." Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

The proposed rule eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

The US has already alienated many of our allies. This rule change adds to the insults already made. Why are there so many immigrants trying to escape gun violence in Central America? More arms to countries like Nicaragua and Honduras will only exacerbate the problem.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93xa-ai6g Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0355

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** cory shamblen

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## General Comment

Please stop extorting money from gun manufacturers who do not export "weapons of war".

Opponents who are against "attempts to legitimize semiautomatic assault rifles as civilian products" should bear in mind that we have had semiautomatic magazine-fed civilian rifles since 1910 (Winchester Model 10 SLR) and that these were never issued to the military.

The much-maligned AR-15 was released as a civilian-only firearm in 1964. The military didn't adopt it until two years later, by having it modified as a fully-automatic rifle (M-16) that civilians cannot own. The AR-15 is in use by NO military power in the world, and never has been.

Do not be bullied by left-wing extremists who would see this nation completely disarmed for their own political power.

Non-military products are under the scope and purview of the Commerce Department, not the State Department.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93xb-4be9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0356

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Bob Andrews

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## General Comment

ITAR overreach is a thing of legend, these are just the beginning of the roll backs that need to be instituted, but at least they're a start.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93xc-plx9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0357

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Dana Jacobson

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to MORE controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93xd-ub2j Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0358

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

These reforms will help take the yoke off of small manufacturers! Make America Great !

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93xe-xa6e Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0359

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Tim Tolliver

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## General Comment

I support this change - this change will be a positive one for small businesses, and will have no change on safety in America.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93xf-gdfc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0360

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Please stop extorting money from gun manufacturers who do not export "weapons of war".

Opponents who are against "attempts to legitimize semiautomatic assault rifles as civilian products" should bear in mind that we have had semiautomatic magazine-fed civilian rifles since 1910 (Winchester Model 10 SLR) and that these were never issued to the military.

The much-maligned AR-15 was released as a civilian-only firearm in 1964. The military didn't adopt it until two years later, by having it modified as a fully-automatic rifle (M-16) that civilians cannot own. The AR-15 is in use by NO military power in the world, and never has been.

Do not be bullied by left-wing extremists who would see this nation completely disarmed for their own political power.

Non-military products are under the scope and purview of the Commerce Department, not the State Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93xp-nhlt Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0361

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Oanh Nguyen

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93xr-jrdz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0362

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lorraine Thompson

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## General Comment

DO NOT amend the International Traffic in Arms Regulations (ITAR) to revise Categories I (firearms, close assault weapons and combat shotguns), II (guns and armament) and III (ammunition and ordnance) of the U.S. Munitions List (USML) to describe more precisely the articles warranting export and temporary import control on the USML. Items removed from the USML would become subject to the Export Administration Regulations (EAR).

The only reason for this amendment is to enable big time arms dealers to make even MORE money and to "facilitate more killings of common citizens around the world in places like the DRC.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93xr-v1o1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0363

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Tim Duncan

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## General Comment

ID: DOS-2017-0046-0061

Tracking Number: 1k2-93nd-lf3l

Do not demand fees from companies that do not export as they should be outside State Department's purview.

Please do not burden small business with these fees and regulations.

These regulations as currently applied cast a broad net that results in many small companies that DO NOT export anything being forced to pay a significant sum of money to an agency that should have no oversight over domestic production of commercial firearms and firearms-related items.

From the perspective of people in the firearms and gunsmithing business, this is an unabashed power and money grab by a huge agency with unlimited resources to crush any small company that does not comply with these regulations as State Department has decided to interpret them.

Small businesses do care greatly about "fees" being imposed on them. Profit margins for many of these small shops are meager to begin with. Once it was announced that very burdensome fees were going to be imposed, many businesses closed. It was not worth the hassle and expense anymore. If the aim of these regulations is to drive small companies out of business leaving only the big fish, this is being brilliantly executed.

Please apply some logic to these regulations.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93xr-arwq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0364

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jonathan Pinkston

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## General Comment

Please stop extorting money from gun manufacturers who do not export.

Opponents who are against "attempts to legitimize semiautomatic assault rifles as civilian products" should bear in mind that we have had semiautomatic magazine-fed civilian rifles since 1910 (Winchester Model 10 SLR) and that these were never issued to the military.

The much-maligned AR-15 was released as a civilian-only firearm in 1964. The military didn't adopt it until two years later, by having it modified as a fully-automatic rifle (M-16) that civilians cannot own. The AR-15 is in use by NO military power in the world, and never has been.

Non-military products are under the scope and purview of the Commerce Department, not the State Department.

Do not be bullied by left-wing extremists who would see this nation completely disarmed for their own political power.

ITAR cost money but provides nothing to non-export businesses. I see this as form of protection money just like the mob. Pay up or else sort of racket. How do you spell RICO? ITAR?

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93xr-fis4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0365

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Liz Anderson

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## General Comment

It is both dangerous and irresponsible to allow greater freedom of arms trafficking.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93xs-8bhw Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0366

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** A.L. Steiner

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## General Comment

I'm writing in FULL OPPOSITION to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries.

As you know, the proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to KILL 1,000 people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to MORE controls and elimination of these weapons, not fewer controls and more weapons!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93xt-ean1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0367

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Bobby Wayne

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## General Comment

I support rule changes to eliminate the itars requirement for businesses that do not conduct international arms trade.

Itars creates an undue burden on small businesses, particularly gunsmiths who repair hunting rifles. It creates no benefit to continue to extend these requirements to business that only conduct business domestically.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93xt-f5bq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0368

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary Sand

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## General Comment

I am opposed to the proposed rule change to move semiautomatic firearms and other dangerous items from the US Munitions List to the Commerce Control List where there is less assurance that these weapons are kept out of the possession of people with nefarious purpose in mind. The CCL is meant for items not easily sold on the black market. Clearly, semiautomatic weapons would be sold on the black market. Crime and human rights in countries with autocratic governments would conceivably worsen. The weapons could find their way back to the US to be used in criminal activity here. The State Department is not obligated to alert Congress to the sale of items on the CCL so there would be less oversight. Transparency in government must be maintained to keep the people of the world safe and democracy from backsliding. A serious change like this must not be dictated by any business involved with the manufacture or sale of these goods. I am thinking perhaps the gun industry has been lobbying for the change. Their interest in gun sales should never override the US responsibility to support safety and human rights everywhere. Thank you for your attention.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93xu-ai26 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0369

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Denise Lytle

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93xv-hp0o Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0370

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Cecilia Burns

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## General Comment

Semi-automatic firearms should stay on the State Department's US Munitions List and NOT be transferred to the Commerce Control List. I am opposed to reclassifying semi-automatic weapons as commercial items. These proposed changes would impact public safety and public health for decades to come.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93xw-2iih Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0371

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ken and Geraldine Grunow

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## General Comment

Dear Regulators,

We have just learned about the proposed re-designation of small arms: automatic and semi-automatic weapons of the AK-47 variety: from the USML to the Commerce Control List. This would reduce the security and monitoring of such transfers.

Having observed the devastating power of these arms in mass killings in our own country, we are deeply concerned about the flow of such weapons into the world market, where they not only may be used in human rights violations abroad but also may find their way back to the US.

The role of our government agencies should be to reduce the level of violence across the world, not to enhance it.

Please do not make these changes! Keep any distribution of such weaponry under close supervision (if we had our way, no one would be getting such weapons).

Thank you for your attention.

Ken and Geraldine Grunow, Dearborn, MI

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93xw-x7oh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0372

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ira Sharp

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93xx-eogg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0373

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Hensley Garlington

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## General Comment

I fully support these changes to ease exports.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93xy-q82y Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0374

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rachel McHale

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93xy-kkp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0375

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Claire Perricelli

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## General Comment

We don't need more automatic and semi automatic weapons circulating in our country.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93xz-kedi Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0376

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sheila Sharpe

---

## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93xz-2px3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0377

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kristin MacLeod

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93y0-anhp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0378

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Craig clark

---

## General Comment

Semi-automatic firearms should stay on the State Department's US Munitions List. With video-games training our children to kill without thought, the abundance of weaponry and ammunition is insane. Children can find weaponry and ammunition unguarded and accessible whereas gun and ammo safes should be mandatory.

Automatic weaponry has been used in many school killings and genocide throughout the world so much so that the thought of reclassifying semi-automatic weapons as commercial items is extremely ludicrous.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93y1-u8sq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0379

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ivan Weinstein

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce. The proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote exports and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93y1-pm1y Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0380

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Steven Wetstein

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## General Comment

I oppose moving semiautomatic weapons from the USML list to the CCL list. Doing so would only increase world violence.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93y2-hapn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0381

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Cynthia Edgerly

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93yd-4saq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0382

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kirk Rhoads

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## General Comment

Semi-automatic firearms should stay on the State Department's US Munitions List.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93ye-m74j Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0383

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Fred Button

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## General Comment

Itars restrictions and fees are burdensom. In cases where a company does not manufacture or sell military equipment or conduct international trade, these burdens are without benefit.

I support the transfer of itars to the commerce Dept and the reduction of the requirement for itars in cases such as those listed above.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93yj-znkh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0384

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Cynthia Edney

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## General Comment

I urge ATF to finalize its proposed rule clarifying that bump-fire stocks, along with other "conversion devices" that enable semiautomatic weapons to mimic automatic fire, qualify as "machineguns" under the National Firearms Act and are generally illegal to possess.

On the night of October 1, 2017, a gunman opened fire from a hotel room on the 32nd floor of the Mandalay Bay hotel into the 22,000 person crowd at the Route 91 Harvest country music festival in Las Vegas, Nevada, killing 58 people and injuring more than 500. The gunman fired more than 1,100 rounds of ammunition in 11 minutes, using semiautomatic rifles modified with dangerous firearm accessories designed to dramatically accelerate the rate of fire, commonly known as "bump-fire stocks". These devices are intended to circumvent the restrictions on possession of fully automatic firearms in the Gun Control Act of 1968 and the National Firearms Act of 1934 by allowing an individual to modify a semiautomatic rifle in such a manner that it operates with a similar rate of fire as a fully automatic rifle. These "conversion devices" that accelerate the rate of fire of a semiautomatic firearm pose a substantial risk to public safety.

In the absence of immediate action by Congress, ATF should finalize its proposed rule, clarifying that conversion devices like bump-fire stocks are included in the definition of "machinegun" under the National Firearms Act of 1934. And then Congress must act as well to ensure that manufacturers cannot continue to endanger public safety by designing devices that imitate machine guns and subvert the law. For the safety of our communities, both Congress and ATF must take action quickly to address this threat.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93yj-5kre Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0385

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Eric Liles

---

## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93ym-bgzc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0386

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Erick Williams

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## General Comment

See attached file(s)

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## Attachments

ITAR amendment comments June 27, 2018



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June 27, 2018

US Department of State  
Bureau of Political Military Affairs  
Directorate of Defense Trade Control  
[DDTCPublicComments@state.gov](mailto:DDTCPublicComments@state.gov)  
<http://www.regulations.gov>

Re: ITAR Amendment—Categories I, II, and III DDTC

Greetings:

These are comments on the Department of State's proposed rule to amend the International Traffic in Arms Regulations (ITAR) and categories I, II and III of the US Munitions List (USML). 83 Federal Register 24166, May 24, 2018.

## **Background**

The ITAR amendment should be revised to better support the rule of law.

The Arms Control and Disarmament Act, at 22 USC 2551, declares:

An ultimate goal of the United States is a world ... in which the use of force has been subordinated to the rule of law ...

No profession is more closely identified with the rule of law than the police profession. Peace officers are the street-level keepers of the law, all over the world. If the United States is committed to “subordinating the use of force to the

rule of law”, it must protect the environment in which peace officers do their work. When armed gangs can overpower local peace officers, local communities become war zones where the rule of law is subordinated to the use of force.

We fail to protect peace officers when we put highly destructive weapons in the hands of civilians who target the police.

The ITAR amendment, as proposed, will make it easier to put firearms in the hands of civilians and armed gangs that are superior to those carried by local peace officers, thus threatening the rule of law in local communities. In several parts of the world, armed gangs are impairing the rule of law, and their activities cross borders. Notorious examples of the adverse effects of firearm proliferation can be seen in Africa and the Middle East, as well as closer to home – in Central America and Mexico, with adverse effects along the southern border of the United States.

See: Alec MacGillis, *“America's Wild-West Gun Laws Are Helping Fuel The Border Crisis: The Unwanted Traffic Between The US And Central America Goes Both Ways”* (New Republic, July 21, 2014), <https://newrepublic.com/article/118759/nra-and-gun-trafficking-are-adding-fuel-border-migrant-crisis>

Robert Muggah and Steven Dudley, Op-Ed: *“The Latin American Gun Leak”*, (Los Angeles Times, January 16, 2015), <http://www.latimes.com/opinion/op-ed/la-oe-muggah-arming-latin-america-20150118-story.html>

*“Attacks against Peacekeepers”* (United Nations OHCHR, May 2017), <https://www.ohchr.org/Documents/Countries/CF/Mapping2003-2015/Factsheet7-EN.pdf>

*“Attacks against civilians and MINUSCA peacekeepers in the town of Bangassou in the Central African Republic”* (Office of the Spokesperson for the UN Secretary-General, May 14, 2017) <https://www.un.org/sg/en/content/statement/2017-05-14/statement-attributable-spokesman-secretary-general-attacks-against>

Alex Yablon, *“American Guns Drive the Migrant Crisis that Trump Wants to Fix with a Wall”* (Trace, May 25, 2017) <https://www.thetrace.org/2017/05/gun-trafficking-central-america-immigrant-crisis-trump-wall/>

Jonathan Blitzer, *“The Link Between America’s Lax Gun Laws and the Violence That Fuels Immigration”* (New Yorker, March 22, 2018),

<https://www.newyorker.com/news/news-desk/the-link-between-americas-lax-gun-laws-and-the-violence-that-fuels-immigration>

See: “*Clear and Present Danger: National Security Experts Warn about the Danger of Unrestricted Sales of 50 Caliber Anti-Armor Sniper Rifles to Civilians*” (Violence Policy Center, July 2005), <http://www.vpc.org/studies/50danger.pdf>

ITAR should focus more attention on the security needs of local communities where firearms are proposed to be exported.

The Department of State is liberalizing its rules on firearm exports partly because the Department of Defense has determined that so-called semi-automatic firearms are of diminished importance in military conflicts. DoD’s determination may well be valid, but it misses the point. Military analysts worry, as they should, about the impact of weapons on the battlefield. But evaluating the impact of firearms on the battlefield gives short shrift to the security needs of civilian communities. To support the rule of law we must consider the impact of firearms on public safety, peace officer safety, crime control, and the prevention and management of civil disturbances. Firearms that “no longer warrant control” by the military may nonetheless overwhelm police patrols and threaten the rule of law in local communities.

ITAR should not treat the US firearms market as the global standard. The United States is proposing to liberalize its rules on firearm exports grounded partly on the false premise that firearms are “widely available in retail outlets ... abroad.” That is not true. The US firearms market is unique. Mexico, for example, has more restrictive gun laws than the United States.

See: Topher McDougal, David A. Shirk, Robert Muggah and John H. Patterson, “*The Way of the Gun: Estimating Firearms Traffic Across the US-Mexico Border*” (Trans-Border Institute, University of San Diego, March 2013), [https://igarape.org.br/wp-content/uploads/2013/03/Paper\\_The\\_Way\\_of\\_the\\_Gun\\_web2.pdf](https://igarape.org.br/wp-content/uploads/2013/03/Paper_The_Way_of_the_Gun_web2.pdf)

Zachary Elkins, Tom Ginsburg & James Melton, “*US Gun Rights Truly Are American Exceptionalism*”, (Bloomberg, March 7, 2013), <https://www.bloomberg.com/view/articles/2013-03-07/u-s-gun-rights-truly-are-american-exceptionalism>

The United States risks alienating friendly foreign nations by projecting its permissive domestic gun laws abroad.

The Department of State has access to information about what kinds of weapons are typically carried by patrol officers in foreign countries. The Department has the wherewithal to judge whether a firearm proposed for export is likely to outmatch the firearms carried by local police forces. The Department should use that knowledge -- and make that judgment -- as it evaluates firearm export applications.

In evaluating the suitability of firearm exports, the ITAR should set a maximum limit on the destructive potential of firearms exportable to civilians. Firearms with muzzle energies higher than, for example, 5,000 Joules should be barred from export to non-government end-users. (In ballistics, muzzle energy, commonly expressed in Joules or foot-pounds, is a measure of the destructive potential of a firearm or cartridge.) The risk that a firearm poses to life and property -- and the danger it poses to police officers -- depends rather more on the firearm's destructive potential and rather less on whether the firearm is automatic, semi-automatic, non-automatic, not-fully-automatic, or over- or under .50-caliber.

Highly destructive weapons should be off-limits for export to civilians. Whatever short-term economic benefit those exports may generate is outweighed by the risk those weapons pose to the safety of peace officers and the rule of law. No firearm with a muzzle energy of 5,000 J belongs on a street anywhere in the world.

### **Policy Recommendations**

The following changes should be incorporated in ITAR:

1. Applications for firearm export licenses should be denied when the firearm proposed for export is of such destructive potential as to threaten the safety of local law enforcement officers.
2. Prohibit exports of firearms with muzzle energies less than 5,000 J, to civilian end-users, world-wide, if the firearm is likely to outmatch weapons carried by local peace officers or otherwise impair the efforts of peace officers to control crime and civil disturbance.
3. Prohibit export of firearms with muzzle energies above 5,000 J to civilian end-users world-wide.

## **Technical Language**

The recommendations above may be translated into the ITAR framework using the technical language below.

(1)

22 CFR 120.4

Add a Note 3 to 22 CFR 120.4 as follows:

FOR FIREARMS AND AMMUNITION, PERFORMANCE CAPABILITY INCLUDES DESTRUCTIVE POTENTIAL, AS MEASURED BY MUZZLE ENERGY, COMMONLY EXPRESSED IN JOULES OR FOOT-POUNDS.

(2)

22 CFR 121.1, Category I

Add Note 3 to Category I of 22 CFR 121.1 as follows:

(a) SUBJECT TO (b) AND (c), APPLICATIONS FOR ITEMS CONTROLLED UNDER THIS CATEGORY WILL GENERALLY BE CONSIDERED FAVORABLY ON A CASE-BY-CASE BASIS UNLESS THERE IS CIVIL DISORDER IN THE COUNTRY OR REGION OR UNLESS THERE IS EVIDENCE THAT THE GOVERNMENT OF THE IMPORTING COUNTRY MAY HAVE VIOLATED INTERNATIONALLY RECOGNIZED HUMAN RIGHTS. THE JUDICIOUS USE OF EXPORT CONTROLS IS INTENDED TO DETER THE DEVELOPMENT OF A CONSISTENT PATTERN OF HUMAN RIGHTS ABUSES, DISTANCE THE UNITED STATES FROM

SUCH ABUSES AND AVOID CONTRIBUTING TO CIVIL DISORDER IN A COUNTRY OR REGION.

(b) A LICENSE APPLICATION FOR A FIREARM OR AMMUNITION WITH MUZZLE ENERGY OF 5,000 JOULES (3,688 FOOT-POUNDS) OR MORE, OR ASSOCIATED EQUIPMENT, SHALL BE DENIED TO NON-GOVERNMENT END-USERS.

(c) A FIREARM, AND AMMUNITION, WITH MUZZLE ENERGY LESS THAN 5,000 JOULES (3,688 FOOT-POUNDS), AND ASSOCIATED EQUIPMENT, MAY BE APPROVED TO NON-GOVERNMENT END-USERS UNLESS THE FIREARM WOULD TEND TO OUTMATCH WEAPONS NORMALLY CARRIED BY LAW ENFORCEMENT OFFICERS ON ROUTINE PATROL IN THE AREA WHERE THE WEAPON WOULD BE AUTHORIZED FOR USE OR OTHERWISE IMPAIR THE EFFORTS OF LAW ENFORCEMENT OFFICERS IN THE AREA TO CONTROL CRIME AND CIVIL DISTURBANCE.

(3)

22 CFR 121.1, category II

Add a Note 3 to category II of 22 CFR 121.1, paragraph (a), as follows:

(a) SUBJECT TO (b) AND (c), APPLICATIONS FOR ITEMS CONTROLLED UNDER THIS CATEGORY WILL GENERALLY BE CONSIDERED FAVORABLY ON A CASE-BY-CASE BASIS UNLESS THERE IS CIVIL DISORDER IN THE COUNTRY OR REGION OR UNLESS THERE IS EVIDENCE THAT THE GOVERNMENT OF THE IMPORTING COUNTRY MAY HAVE VIOLATED INTERNATIONALLY



RECOGNIZED HUMAN RIGHTS. THE JUDICIOUS USE OF EXPORT CONTROLS IS INTENDED TO DETER THE DEVELOPMENT OF A CONSISTENT PATTERN OF HUMAN RIGHTS ABUSES, DISTANCE THE UNITED STATES FROM SUCH ABUSES AND AVOID CONTRIBUTING TO CIVIL DISORDER IN A COUNTRY OR REGION.

(b) A LICENSE APPLICATION FOR A FIREARM OR AMMUNITION WITH MUZZLE ENERGY OF 5,000 JOULES (3,688 FOOT-POUNDS) OR MORE, OR ASSOCIATED EQUIPMENT, SHALL BE DENIED TO NON-GOVERNMENT END-USERS.

(c) A FIREARM, AND AMMUNITION, WITH MUZZLE ENERGY LESS THAN 5,000 JOULES (3,688 FOOT-POUNDS), AND ASSOCIATED EQUIPMENT, MAY BE APPROVED TO NON-GOVERNMENT END-USERS UNLESS THE FIREARM WOULD TEND TO OUTMATCH WEAPONS NORMALLY CARRIED BY LAW ENFORCEMENT OFFICERS ON ROUTINE PATROL IN THE AREA WHERE THE WEAPON WOULD BE AUTHORIZED FOR USE OR OTHERWISE IMPAIR THE EFFORTS OF LAW ENFORCEMENT OFFICERS IN THE AREA TO CONTROL CRIME AND CIVIL DISTURBANCE.

(4)

22 CFR 121.1, category III

Add a new paragraph 4 to notes to category III of 22 CFR 121.1, as follows:

(a) SUBJECT TO (b) AND (c), APPLICATIONS FOR ITEMS CONTROLLED UNDER THIS CATEGORY WILL

GENERALLY BE CONSIDERED FAVORABLY ON A CASE-BY-CASE BASIS UNLESS THERE IS CIVIL DISORDER IN THE COUNTRY OR REGION OR UNLESS THERE IS EVIDENCE THAT THE GOVERNMENT OF THE IMPORTING COUNTRY MAY HAVE VIOLATED INTERNATIONALLY RECOGNIZED HUMAN RIGHTS. THE JUDICIOUS USE OF EXPORT CONTROLS IS INTENDED TO DETER THE DEVELOPMENT OF A CONSISTENT PATTERN OF HUMAN RIGHTS ABUSES, DISTANCE THE UNITED STATES FROM SUCH ABUSES AND AVOID CONTRIBUTING TO CIVIL DISORDER IN A COUNTRY OR REGION.

(b) A LICENSE APPLICATION FOR AMMUNITION WITH MUZZLE ENERGY OF 5,000 JOULES (3,688 FOOT-POUNDS) OR MORE, OR ASSOCIATED EQUIPMENT, SHALL BE DENIED TO NON-GOVERNMENT END-USERS.

(c) AMMUNITION, WITH MUZZLE ENERGY LESS THAN 5,000 JOULES (3,688 FOOT-POUNDS) MAY BE APPROVED TO NON-GOVERNMENT END-USERS UNLESS THE FIREARM WOULD TEND TO OUTMATCH WEAPONS NORMALLY CARRIED BY LAW ENFORCEMENT OFFICERS ON ROUTINE PATROL IN THE AREA WHERE THE WEAPON WOULD BE AUTHORIZED FOR USE OR OTHERWISE IMPAIR THE EFFORTS OF LAW ENFORCEMENT OFFICERS IN THE AREA TO CONTROL CRIME AND CIVIL DISTURBANCE.



(5)

15 CFR 124.14 (c) (9)

Amend 15 CFR 124.14 (c) (9) as follows:

(a) Unless the articles covered by the agreement are in fact intended to be distributed to private persons or entities (e.g., cryptographic devices and software for financial and business applications), the following clause must be included in all warehousing and distribution agreements: “Sales or other transfers of the licensed article shall be limited to governments of the countries in the distribution territory and to private entities seeking to procure the licensed article pursuant to a contract with a government within the distribution territory, unless the prior written approval of the U.S. Department of State is obtained.

(b) SUBJECT TO (c) AND (d), APPLICATIONS FOR ITEMS CONTROLLED UNDER THIS CATEGORY WILL GENERALLY BE CONSIDERED FAVORABLY ON A CASE-BY-CASE BASIS UNLESS THERE IS CIVIL DISORDER IN THE COUNTRY OR REGION OR UNLESS THERE IS EVIDENCE THAT THE GOVERNMENT OF THE IMPORTING COUNTRY MAY HAVE VIOLATED INTERNATIONALLY RECOGNIZED HUMAN RIGHTS. THE JUDICIOUS USE OF EXPORT CONTROLS IS INTENDED TO DETER THE DEVELOPMENT OF A CONSISTENT PATTERN OF HUMAN RIGHTS ABUSES, DISTANCE THE UNITED STATES FROM SUCH ABUSES AND AVOID CONTRIBUTING TO CIVIL DISORDER IN A COUNTRY OR REGION.

(c) A LICENSE APPLICATION FOR A FIREARM OR AMMUNITION WITH MUZZLE ENERGY OF 5,000 JOULES (3,688 FOOT-POUNDS) OR MORE, OR ASSOCIATED

EQUIPMENT, SHALL BE DENIED TO NON-GOVERNMENT END-USERS.

(d) A FIREARM, AND AMMUNITION, WITH MUZZLE ENERGY LESS THAN 5,000 JOULES (3,688 FOOT-POUNDS), AND ASSOCIATED EQUIPMENT, MAY BE APPROVED TO NON-GOVERNMENT END-USERS UNLESS THE FIREARM WOULD TEND TO OUTMATCH WEAPONS NORMALLY CARRIED BY LAW ENFORCEMENT OFFICERS ON ROUTINE PATROL IN THE AREA WHERE THE WEAPON WOULD BE AUTHORIZED FOR USE OR OTHERWISE IMPAIR THE EFFORTS OF LAW ENFORCEMENT OFFICERS IN THE AREA TO CONTROL CRIME AND CIVIL DISTURBANCE.

(6)

22 CFR Part 126, Supplement No. 1

In 22 CFR Part 126, Supplement No. 1, category I (a-e) (firearms and related articles), mark all three country boxes with an X.

In 22 CFR Part 126, Supplement No. 1, category II (a) (guns and armament), mark all three country boxes with an X.

In 22 CFR Part 126, Supplement No. 1, category III (ammunition and ordinance), mark all three country boxes with an X.

(7)

22 CFR 129.7 (b)

Amend 22 CFR 129.7 (b) to add the following:

(b) No person may engage in or make a proposal to engage in brokering activities that involve any country, area, or person referred to in § 126.1 of this subchapter without first obtaining the approval of the Directorate of Defense Trade Controls. NO PERSON MAY ENGAGE IN OR MAKE A PROPOSAL TO ENGAGE IN BROKERING ACTIVITIES THAT INVOLVE EXPORTING OR TRANSFERRING, TO A NON-GOVERNMENT PERSON, A FIREARM OR AMMUNITION WITH MUZZLE ENERGY GREATER THAN 5,000 JOULES (3,688 FOOT-POUNDS), OR ASSOCIATED EQUIPMENT. NO PERSON MAY ENGAGE IN OR MAKE A PROPOSAL TO ENGAGE IN BROKERING ACTIVITIES THAT INVOLVE EXPORT OR TRANSFER, TO A NON-GOVERNMENT PERSON, OF A FIREARM OR AMMUNITION WITH MUZZLE ENERGY LESS THAN 5,000 JOULES (3,688 FOOT-POUNDS) OR ASSOCIATED EQUIPMENT IF THE ITEM IS LIKELY TO OUTMATCH LAW ENFORCEMENT OFFICERS ON ROUTINE PATROL IN THE AREA WHERE THE ARTICLE WOULD BE AUTHORIZED FOR USE.

Thank you for the opportunity to submit comments on the ITAR amendment.

Sincerely,

William A. Root  
Erick Williams

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93yn-fm32 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0387

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Steve Delturk

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## General Comment

The administration makes it clear that its priority is on profit of a few of the most wealthy Americans rather than on human life when it makes it easier to send guns out to the rest of the world while making it harder for people fleeing violence to come into the United States for safety (and detains the families of many who do).

The US has historically supported arming groups overseas who use the arms to cause massive amounts of harm to innocent people (arming the Saudi coalition's current war in Yemen, which the UN has described as the world's worst humanitarian crisis, is a clear example). The US's actions in arms exports not only harm innocent people overseas, but they also come back to harm Americans. The United States provided arms that allowed Al-Qaeda to thrive under Osama Bin-Laden, and he later orchestrated the most devastating terrorist attack to occur on United States soil in history. Although, in practice, US arms often get into the hands of those who kill innocents and violate human rights, one of the few regulations that we have to protect human rights and human lives is the restrictions that are placed on items that are on the USML list.

Guns have no shelf-life and will operate as long as they are maintained. They are not regular products for trade but machines designed to end human life. Moving guns from the USML to the CCL will put even less regulation on gun exports from the US - to do so is to empower those who would kill innocents to make it easier to acquire guns overseas, for the financial benefit of wealthy American gun manufacturers. These guns could be used for generations, ending lives, traumatizing families and communities, and threatening the US's national security.

In making this decision, the Department of State must decide whether the profits of a few wealthy gun manufacturers are worth this blatant disregard for the sanctity of human life. At a time when protests against gun violence have reached an all-time high, it also must consider if it is ready for the backlash from the American public it will face in making these decisions and if it is ready to be written into history as an administration that enabled the perpetuation of gun violence to an even higher degree. The majority of the American people who have not had to live with gun violence in their daily lives, unlike those of us who live in violence afflicted-cities and have long known the problem intimately, are more

aware of gun legislation and its consequences than ever before, and I believe they will not be silent on this decision and will hold all decision makers accountable.

For respecting the sanctity of the lives of individuals overseas who may be affected by this decision, for the national security of the United States, and for its own legacy, it is my hope that the Department of State under this administration will choose to keep semi-automatic firearms on the USML, where there are greater protections to prevent guns from getting in the hands of actors that are known human rights abusers and greater protections to prevent guns being trafficked on the black market.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93yn-zqmq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0388

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93yp-l6x3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0389

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Adrienne Heinzelman

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93yq-ihjz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0390

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Erick Williams

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## General Comment

This is a copy of the comments submitted to the Department of Commerce on the EAR amendments.

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## Attachments

EAR amendment comment 22 Jun 18



Erick Williams, JD  
1209 Old Hickory  
East Lansing, MI 48823

June 22, 2018

Regulatory Policy Division  
Bureau of Industry and Security  
US Department of Commerce  
14th St and Pennsylvania Ave, NW, Room 2099B  
Washington, DC 20230  
<http://www.regulations.gov>

Re: Docket No. BIS-2017-0004; RIN 0694-AF47

Greetings:

These are comments on the Commerce Department proposed rule, “Control of Firearms, Guns, Ammunition and Related Articles the President Determines No Longer Warrant Control under the United States Munitions List.” 83 Federal Register 24166, May 24, 2018, <https://www.federalregister.gov/documents/2018/05/24/2018-10367/control-of-firearms-guns-ammunition-and-related-articles-the-president-determines-no-longer-warrant>

## **Background**

The rules governing firearm exports should give the police profession a greater, better-defined role in the evaluation of firearm export license applications.

15 CFR 738.2 (d) (2) (ii) (A) (CC) provides that items proposed for export are controlled for “crime control” reasons. The practice of controlling exports for crime control reasons reflects a basic principle

underlying arms control treaties and statutes. The proliferation of weapons should be controlled because it tends to impair the rule of law.

To assure that the rule of law is not impaired by firearm exports, licensing officials should consider the effect of proposed exports on local communities, public safety, peace officer safety, crime control, and control of civil disturbances.

In several parts of the world, armed gangs are impairing the rule of law, and their activities cross borders. As a major producer of firearms, the USA, through export law enforcement, can help limit the flows of weapons to armed gangs. The police profession, closely associated with the rule of law, is a critical stakeholder in the arms export licensing process.

Unfortunately, neither the current nor the proposed rules governing firearm exports provide for export license applications to be vetted by people with police backgrounds.

Historically, the weapons analysts who vet arms export licenses have been with the Defense Department. Military analysts worry (as they should) about the impact of weapons on the battlefield. But defense analysis does not necessarily evaluate transactions with an eye to the security needs of civilian communities -- public safety, peace officer safety, crime control, and the prevention and management of civil disturbances.

Firearms that “no longer warrant control” by the military can nonetheless destabilize communities, overwhelm peace officers and contribute to civil disorder.

Notorious examples of the adverse effects of firearm proliferation have come from Africa and the Middle East as well as closer to home -- Mexico and Central America.

See: Alec MacGillis, *“America's Wild-West Gun Laws Are Helping Fuel The Border Crisis: The Unwanted Traffic Between The Us And Central America Goes Both Ways”* (New Republic, July 21, 2014), <https://newrepublic.com/article/118759/nra-and-gun-trafficking-are-adding-fuel-border-migrant-crisis>

Robert Muggah and Steven Dudley, Op-Ed: *“The Latin American Gun Leak”*, (Los Angeles Times, January 16, 2015), <http://www.latimes.com/opinion/op-ed/la-oe-muggah-arming-latin-america-20150118-story.html>

*“Attacks Against Peacekeepers”* (United Nations OHCHR, May 2017), <https://www.ohchr.org/Documents/Countries/CF/Mapping2003-2015/Factsheet7-EN.pdf>

*“Attacks against civilians and MINUSCA peacekeepers in the town of Bangassou in the Central African Republic”* (Office of the Spokesperson for the UN Secretary-General, May 14, 2017) <https://www.un.org/sg/en/content/statement/2017-05-14/statement-attributable-spokesman-secretary-general-attacks-against>

Alex Yablon, *“American Guns Drive the Migrant Crisis that Trump Wants to Fix with a Wall”* (Trace, May 25, 2017) <https://www.thetrace.org/2017/05/gun-trafficking-central-america-immigrant-crisis-trump-wall/>

Jonathan Blitzer, *“The Link Between America’s Lax Gun Laws and the Violence That Fuels Immigration”* (New Yorker, March 22, 2018), <https://www.newyorker.com/news/news-desk/the-link-between-americas-lax-gun-laws-and-the-violence-that-fuels-immigration>

Highly destructive weapons should not be exported to civilians.

Whatever short term economic benefit those exports may generate is outweighed by the risk those weapons pose to the safety of peace officers and the rule of law.

We suggest a maximum limit on firepower exported to civilians. Firearms with a muzzle energy higher than 5,000 Joules should be barred from export to non-government end-users. (In ballistics, muzzle energy, commonly expressed in Joules or foot-pounds, is a measure of the destructive potential of a firearm or cartridge. Tables comparing the muzzle energies of various firearms are available on the Internet.)

See: *“Clear and Present Danger: National Security Experts Warn About the Danger of Unrestricted Sales of 50 Caliber Anti-Armor Sniper Rifles to Civilians”* (Violence Policy Center, July 2005), <http://www.vpc.org/studies/50danger.pdf>

Weapons of high destructive potential have no place on any street in the world, and they should be off-limits for export to civilians.

## **Policy Recommendations**

The following changes should be incorporated in the new rules:

1. Prohibit export of firearms, above a maximum limit of destructiveness, to civilian end-users, world-wide. A muzzle energy of 5,000 Joules (3,688 foot-pounds) is here proposed as the maximum limit.
2. Prohibit exports of firearms with muzzle energies less than 5,000 Joules, to civilian end-users, world-wide, if the firearm is likely to outmatch weapons carried by local peace officers or otherwise impair the efforts of peace officers to control crime and civil disturbance.

3. Recognize the police profession as a stakeholder in firearm exports. Give the profession a role in vetting license applications.

## **Technical Language**

The recommendations above may be translated into the EAR framework using the technical language below.

4. In 15 CFR Appendix Supplement No 1 to Part 738, the Commerce Country Chart, add a column 4 under crime control. Mark each country box to indicate that the crime control reason for control applies to all countries.

5. In 15 CFR 738.2 (d) (1), reason for control item 5. Amend item 5 to read (changes in CAPS):

5: Items warranting national security, CRIME CONTROL, or foreign policy controls at the determination of the Department of Commerce.

6. In 15 CFR 738.3 (a) (1) add a sentence that reads: A LICENSE IS REQUIRED FOR ALL DESTINATIONS FOR FIREARMS AND ASSOCIATED EQUIPMENT CONTROLLED UNDER ECCN 0A501, 0A502, 0A504, AND 0A505, WHICH ARE SUBJECT TO 15 CFR 742.7 (b) (2) or (b) (3).

7. In 15 CFR Appendix Supplement No 1 to Part 774, the Commerce Control List, add crime control as a reason for control under 0A501, 0A502, 0A504, and 0A505. CC column 4 (referred to above) should apply to each, entire entry. In each entry, insert: ALL ITEMS ARE SUBJECT TO THE CRIME CONTROL LICENSING POLICY IN 15 CFR 742.7 (b) (2) or (b) (3).

8. Amend 15 CFR 742.7 (b) to read as follows (changes in CAPS):

(b) Licensing policy.

(1) EXCEPT AS DESCRIBED IN (b) (2) and (b) (3) BELOW, applications for items controlled under this section will generally be considered favorably on a case-by-case basis unless there is civil disorder in the country or region or unless there is evidence that the government of the importing country may have violated internationally recognized human rights. The judicious use of export controls is intended to deter the development of a consistent pattern of human rights abuses, distance the United States from such abuses and avoid contributing to civil disorder in a country or region.

(2) A LICENSE APPLICATION FOR A FIREARM WITH MUZZLE ENERGY OF 5,000 JOULES (3,688 FOOT-POUNDS) OR MORE (AND EQUIPMENT ASSOCIATED WITH THE FIREARM) SHALL BE DENIED TO NON-GOVERNMENT END-USERS.

(3) A FIREARM WITH MUZZLE ENERGY LESS THAN 5,000 JOULES (3,688 FOOT-POUNDS), AND EQUIPMENT ASSOCIATED WITH THE FIREARM, MAY BE APPROVED TO NON-GOVERNMENT END-USERS UNLESS THE FIREARM WOULD TEND TO OUTMATCH WEAPONS NORMALLY CARRIED BY PEACE OFFICERS ON ROUTINE PATROL IN THE AREA WHERE THE WEAPON WOULD BE USED OR OTHERWISE IMPAIR THE EFFORTS OF PEACE OFFICERS IN THE AREA TO CONTROL CRIME AND CIVIL DISTURBANCE.

9. In 15 CFR Appendix Supplement No 2 to Part 730, Technical Advisory Committees, allow creation of a technical advisory committee with representation from the police profession to provide technical



advice on matters such as police procedure, public safety, peace officer safety, crime control, and control of civil disorder. At least two organizations in the United States -- one federal and the other state-based -- may be competent to give the Commerce Department technical advice on police standards outside the USA. They are the International Criminal Investigative Training Assistance Program, <https://www.justice.gov/criminal-icitap>, and the International Association of Directors of Law Enforcement Standards and Training, <https://www.iadlest.org>.

Thank you for the opportunity to submit comments on the proposed rules.

Sincerely,

Erick Williams, JD

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93yt-nry0 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0391

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rachelle Fish

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## General Comment

We urge you to reverse the proposed regulations that would make it easier to export semi-automatic weapons and ammunition, eliminate Congressional oversight of these sales, weaken end-use controls, and enable production of 3D weapons anywhere. We have seen the effects of these weapons in U.S. shootings, and know they are used around the world to kill and attack hundreds of people every day in violent crime, wars, and political violence. U.S. export controls for weapons used in violence should be made stronger, not weaker.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93z4-29mn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0392

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** carl tyndall

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## General Comment

Please set the record straight. I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93zb-2h9i Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0393

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Katrina Kelly

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce. This is because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93zb-2txb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0394

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Claudine Thies

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93zb-f00c Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0395

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elizabeth Hansen

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93zd-ec4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0396

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Melissa Brady

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## General Comment

COPY SCRIPT: "I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93ze-hhkt Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0397

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** MAryse Levenson

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## General Comment

"I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce

because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed

conflicts, and the civilian possession of such weapons is prohibited in many countries.

The proposed rule also: eliminates Congressional oversight

for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers;

and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency

with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade

and which lacks the resources to adequately enforce export controls.

Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism,

and human rights violations. This is the kind of violence that sends refugees fleeing to our borders.

Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93zf-r2is Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0398

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Susan Babbitt

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## General Comment

I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. It reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls. We need more, not fewer, controls on firearms.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93zi-l4vi Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0399

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** sean schroeder

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## General Comment

I Agree the Proposed rule.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93zr-8lwg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0400

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Paul Sacilotto

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. In addition, converting these weapons from semi to automatic fire is not difficult. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers (socializing the risk, privatizing the gain); and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. The unintended consequence of this action would be to label the United States as the Merchants of Death. These firearms should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-93zw-up6d Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0401

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Please Don't Do It! I oppose moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. These weapons are used in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. This is the kind of violence that sends refugees fleeing to our borders. Arms exports must be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9401-nfmw Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0402

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Phil Steinschneider

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## General Comment

Amendments to the International Traffic in Arms Regulations are very welcome. As a Type 01 Federally Licensed Firearms dealer, our company has been waiting for this change to happen for several years. It will allow us to expand our operations into manufacturing and export, which will potentially make it possible for us to create new jobs and new opportunities for workers within our company, as well as the various vendors that supply us.

On the other hand, several proposed changes fall short of what we were expecting.

Why are suppressors not being placed on the CCL? These are in common use throughout the United States and in Europe. In some European countries, silencers are not regulated at all, or much less regulated than in the US. Put suppressors on the CCL in order to stimulate innovation among US-based manufacturers. This makes even more sense if suppressors are eventually removed from the National Firearms Act, which is quite possible in the future.

It makes no sense to continue leaving firearm technologies that have been around for over 100 years under ITAR. This appears to be a political decision rather than a logical one. Move common automatic weapons to the CCL.

Due to their heavily-regulated nature, automatic firearms will be still difficult to export. Leaving them under ITAR will only hurt the US, as it will continue to constrain less well-heeled small arms manufacturers, who might develop the next Thompson SMG, M1 Garand, or M16. Does no one wonder why automatic firearm technology has been at a standstill essentially for over 60 years?

All of Category I should be moved to the CCL. Items of likely greater concern fall under Category II and Category III. The revisions to those sections will of course depend on the items enumerated in the changes.

As a Type 01 FFL, we are looking forward to these reforms in order to acquire a Type 07 license. Because we are a small concern, the ITAR fee has have been a barrier to entry for us. We will still feel

constrained by the omission of suppressors and commonly-available automatic weapons from these changes, however. If these had been placed on the CCL, we would have become a Type 07/SOT. Under the current proposal, an 07/SOT will be required still to pay the ITAR fee.

These rules have always been complex, so simplification and clarification are appreciated. Those who would violate them will do it despite these regulations, however. The only companies that benefit from any remaining complexity technologies moved to the CCL are those with the capital and resources to hire entire compliance departments at the expense of productive activity. The time and money wasted complying with ITAR could so much more easily be used for the development of new technologies and new jobs for Americans.

Nonetheless, these changes are certainly welcome, and will go a long way to help make the American defense industry more competitive the worldwide defense article marketplace.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9413-3as9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0403

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Dean Hornsby

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## General Comment

Why do you people have the ludicrous perception that any legislation you pass is going to stop anyone from committing crimes?

Words on a piece of paper, which you refuse to read before voting on them, are as useless as the ink used to write them. As

quoted from John Dean "Jeff" Cooper "Killing is a matter of will, not weapons. You can't control the act itself by passing laws

about the means employed."

Jeff Cooper, 1958

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9415-ap08 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0404

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Julie Stern

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9415-s62d Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0405

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9416-fqkl Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0406

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** M M

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. I cannot support any action that will endanger the lives of American citizens overseas and this change will make it easier for terrorists and foreign entities to secure American-made firearms, including deadly assault weapons, for killing Americans living, working, or traveling abroad.

In my view, the proposed rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. If your agency approves this blatant corporate giveaway and vast disregard for national security, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board.

I am submitting this comment anonymously as the NRA and their syncophants use threatening language against anyone who questions their reasoning, data, or motivations. This is a matter of national security. Please wake up.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9419-qj24 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0407

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Michael Garitty

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-941a-puc6 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0408

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jordan Gochman

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-941c-sa8l Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0409

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Samantha Turetsky

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-941d-vtce Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0410

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

In the matter of the proposed changes to how ITAR is implemented I would like to raise several points of concern.

First let me say that I welcome nearly all the changes as proposed. My professional background is in ammunition manufacturing. I have patented my own invention and am called upon to act in the capacity of an expert witness in legal matters. In addition to the 20+ years experience I have spent 12 years running the local 4-H Shooting Sports Program in my county. During that time youth from my club have competed in many local and national events. Many have medaled in big matches including one national champion in air rifle.

Concern #1.

The dollar value placed on exporting bullets (not loaded ammunition) seems impossible to actually kick in and out of skew with the rest of the proposed levels for other items. In many cases this would limit the buyer to only a single box of bullets. Many boxes of bullets, especially ones that are not made in but one or two countries are quite expensive. For example the following is the cost for a box of just 50 bullets.

.348 250 gr = \$43.50

.33 200 gr = \$41.00

38-55 255 gr = \$41.00

.408 350 gr = \$46.00

.404 350 gr = \$59.00

.425 400 gr = \$66.00

43 Spanish 400 gr = \$46.00

.475 #2 500 gr = \$106.50

50-110 450 gr = \$54.50

50-70 450 gr = \$54.00

.505 500 gr = \$72.00

.577 650 gr = \$83.50

Also many common caliber bullets made as a premium hunting bullet in a special weight are equally expensive per bullet.

30 cal 250 gr = \$45.50

32 Rem 170 gr = \$40.00 w/ minimum of 3 boxes

.358 300 gr = \$63.50 w/ minimum of 3 boxes

.416 400 gr = \$50.50

.458 500 gr = \$111.50

50 cal 500 gr = \$68.00

Based upon the other covered items in ITAR it would seem that the \$100.00 is just too low and should be \$300.00 minimum to allow someone with a small purchase of 200 300 bullets to reload for an older or odd hunting rifle. This is applicable to brass cartridge cases as well. And both are often purchased together. In all fairness ammunition components should be equal to the \$500.00 level assigned to gun parts.

#### Concern #2.

International competition in small bore rifle may be hurt with the 1,000 round limits on ammunition. Many matches require 100 or 200 shots for record. Usually the event has several days of competition. The match starts with sighters and if conditions are difficult (wind, lighting, and mirage) the rounds fired as sighters in a match can approach the number needed for record. Usually long distance travelers are given the day ahead to check everything and practice before the actual event. A junior shooter competed in Europe then visited the MEC shooting complex for one on one training before returning to the states. The days training was valuable and worth using double the amount of ammunition used in a two day competition. Certain unusual matches require many more record shots. The metric prone event is two days long and consists of 600 record shots. For these reasons I recommend making an exception for small bore 22 rimfire ammunition and allowing 2,000 rounds when traveling out of the country. I am not aware of the requirements for shotgun competitions but think they are in a similar situation. Gold medalist Kim Rhode practices with 800 shots a day. Perhaps the exemption can be specified for competitors.

Thanks for the changes to come.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-941p-rook Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0411

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of non-military firearms exports from the State Department to the Commerce Department. This proposed rule has one purpose and one purpose only: to garner profits for a U.S. gun industry that is faring poorly domestically. It comes after a multi-year lobbying campaign by the NRA and National Shooting Sports Foundation (the NSSF has already boasted the change would lead to a 20% increase in firearms exports). NO ONE other than the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. The U.S. Congress would also lose its ability to oversee commercial weapons sales of \$1 million or more, which is inane. Im also disgusted by the rules attempts to legitimize semiautomatic assault rifles as civilian products when these battlefield weapons have stolen so many of our loved ones from us. If your agency approves this blatant corporate giveaway, I will do everything in my power to hold your leadership accountable for the resulting bloodshed that occurs globally. That will include advocating against your budget priorities across-the-board until a new administration cleans house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-941p-dzuj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0412

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** sandra matlow

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce. The proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode and these weapons are used by state and non-state groups in armed conflicts.

The proposed rule eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources or the interest to adequately enforce export controls.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-941s-8o6a Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0413

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rachel Graber

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## General Comment

See attached comments

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## Attachments

Comment on DOS-2017-0046



As a domestic violence prevention advocate, I know full well the toll gun violence takes on women across the world. Abusers' use of firearms to threaten, control, injure, and kill knows no borders or boundaries. I oppose the proposed rule for the following reasons:

1. The proposed rule treats semi-automatic assault rifles as "non-military." But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.
2. The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.<sup>i</sup> Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress' proper role.
3. The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government -- i.e., taxpayers -- will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.
4. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.<sup>ii</sup>
5. The rule reduces end-use controls for gun exports. It would eliminate the State Department's Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Government's information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporter's history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.
6. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is

unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

7. The Commerce Department does not have resources to enforce export controls, even before the addition of 10,000 firearms export license applicants as a result of this rule predicted by Commerce.<sup>iii</sup> The BIS's enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.
8. The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.
9. This rule would transfer gun export licensing to an agency – the Commerce Department - whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.
10. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries.<sup>iv</sup> The export of these weapons should be subject to more controls, not less.

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<sup>i</sup> "US lawmakers balk at arms sales to Saudi Arabia, Turkey and Nigeria," *DefenseNews*, Sept. 26, 2017, <https://www.defensenews.com/congress/2017/09/26/us-lawmakers-balk-at-arms-sales-to-saudi-arabia-turkey-and-nigeria/>

<sup>ii</sup> "Arms Dealer Faces New Charges," *New York Times*, Aug. 23, 2010, <https://www.nytimes.com/2010/08/24/us/24arms.html>

<sup>iii</sup> Department of Commerce Budget in Brief FY2017, p. 57, <http://www.osec.doc.gov/bmi/budget/FY17BIB/AllFilesWithCharts2.pdf>

<sup>iv</sup> Ongoing resource on "Cross Border Gun Trafficking: An Ongoing Analysis of the Types of Firearms Illegally Trafficked from the United States to Mexico and Other Latin American and Caribbean Countries as Revealed in U.S. Court Documents," by the Violence Policy Center, <http://www.vpc.org/indicted/>

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-941t-9hv6 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0414

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sheba McCants

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## General Comment

I oppose the proposed rule for the following reasons:

1. The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states, the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

2. The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey. Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

3. The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government -- i.e., taxpayers -- will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

4. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for

brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.

5. The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s.

Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

6. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-941u-noso Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0415

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sarah Doenmez

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## General Comment

Do NOT re-classify semi-automatic weapons as commercial items. These weapons have been used in horrendous acts of violence all over the world. The US should not be a state that sells violence to the world, profiting from human rights abuses.

Sincerely,  
Sarah Doenmez  
Dublin, NH 03444

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-941x-qps1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0416

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jodi Domanic

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## General Comment

I strongly oppose this proposed rule which would transfer oversight of regulations on certain firearms from the State Department to the Commerce Department. The only Americans lobbying for this change is the gun lobby and while they may be very vocal, they are not the majority of U.S. citizens. This action will only serve to put even more guns into our country ... our country that already is #1 in guns per person as well as deaths from guns by far of civilized countries. We are reminded on a daily basis of how dangerous our country is partly because of lenient regulations regarding firearms. We NEED to stop the bleeding!! Literally & figuratively. Please oppose this proposed rule!!



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9420-zf5t Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0417

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I completely oppose this proposed rule. The US government should not be taking orders from the NRA, which fears losing sales in the US because of right and righteous concerns over gun violence, and so wishes to export its means of profiting. This should not be US policy, human policy, or international relations. It is a transparent give-away to forces that will only further disrupt and derail Mexico's efforts to police its drug traffickers and curb its corruption.

Please reject this proposal.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9420-2zn7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0418

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Fred Granlund

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## General Comment

I am writing to OPPOSE the proposed rule changes on grounds of excessive danger to civilians and lack of accountability to keep weapons out of the hands of terrorists and others working against our national interests. My specific objections are listed in the attached document: arms\_sales.rtf.

Thank you for your consideration of my comments.

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## Attachments

arms\_sales



## Reasons to OPPOSE International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

1. The proposed rule treats semi-automatic assault rifles as “non-military.” But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.
2. The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[ii] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress’ proper role.
3. The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government -- i.e., taxpayers -- will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.
4. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.[iii]
5. The rule reduces end-use controls for gun exports. It would eliminate the State Department’s Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Government’s information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporter’s history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of

these firearms from the State Department database, weakening enforcement against arms trafficking.

6. The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

7. The Commerce Department does not have resources to enforce export controls, even before the addition of 30,000 firearms export licenses as a result of this rule predicted by Commerce.[iv] The BIS's enforcement office, with no staff in Latin America, Africa, or many other parts of the world, is not equipped to take the same level of preventive measures for end-use controls. Moreover, the State Department has developed extensive data, expertise and institutional relations to implement the Leahy Law for security assistance, which can serve as a critical foundation in both pre-license and post-shipment checks to control and verify end uses and end users. Commerce does not have these resources.

8. The proposed change will reduce transparency and reporting on gun exports. The rule would eliminate Congressional and public awareness of the total amount (dollar value and items) of firearms sales authorizations and deliveries around the world, since the Commerce Department annual reports currently only cover about 20 countries.

9. This rule would transfer gun export licensing to an agency - the Commerce Department - whose principle mission is to promote trade. Firearms, both assault weapons and non-semi-automatic weapons, are uniquely and pervasively used in criminal violence around the world. Controlling their export should be handled by the State Department, which is mandated and structured to address the potential impacts in importing nations on stability, human security, conflict, and human rights.

10. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. Research indicates that the types of weapons being transferred to Commerce control, including AR-15, AK-47, and other military-style assault rifles and their ammunition, are weapons of choice for criminal organizations in Mexico and other Latin American countries that are responsible for most of the increasing and record levels of homicides in those countries.[v] The export of these weapons should be subject to more controls, not less.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9421-27on Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0419

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Benita J. Campbell

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## General Comment

As a citizen of the United States, I have grave concerns about our violent gun culture that does so much harm to individuals, families, and society at large.

I oppose the proposed rule for the following reasons.

1. The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.
2. The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[ii] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.
3. The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government -- i.e., taxpayers -- will absorb the

cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

4. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.[iii]

5. The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9422-pkee Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0420

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Gary Smith

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer. We've lost our moral compass if we agree to this shift in oversight.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-9422-68qw Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0421

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sarah Brown

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## General Comment

I hope you will oppose the Trump Administration's proposal to transfer licensing and oversight of firearms exports from the State Department to the Commerce Department. The proposal weakens controls over semiautomatic assault weapons, .50 sniper rifles, high-capacity ammunition magazines and it may deregulate 3D printing of guns. It could also weaken controls on gun imports.

The proposed transfer will likely lead to more U.S. guns getting into the hands of criminal organizations, human rights abusers, and terrorist groups around the globe.

It's no surprise that the proposed rules are a priority for the National Rifle Association and the Newtown-based National Shooting Sports Foundation. Clearly, their goal is to open up international markets to compensate for lagging domestic sales. They are willing to spread our gun violence all over the world to boost gun industry profits.



# PUBLIC SUBMISSION

<b>As of:</b> November 29, 2018 <b>Tracking No.</b> 1k2-9425-s8xl <b>Comments Due:</b> July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0422

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jean Lindgren

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## General Comment

I'm a long time resident of San Francisco, California and am absolutely appalled by the hundreds...thousands...of people being killed by unstable humans...mainly white males...wielding automatic and semi-automatic weapons!!!! This MUST STOP! NO CIVILIAN NEEDS SUCH A WEAPON!!!!

Therefore, I strongly oppose the proposed rule for the following reasons:

1. It eliminates Congressional oversight for important gun export deals.
2. Transfers the cost of processing licenses from gun manufacturers to taxpayers. That's totally wrong and unfair.
3. Removes statutory license requirements for brokers thereby increasing the risk of trafficking.
4. Reduces or eliminates end-use controls, such as the State Depts Blue Lantern program...eliminating registration of firearms exporters has been a requirement since the 1940s for very good reasons!
5. Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.
6. Reduces transparency and reporting on gun exports.
7. Transfers gun export licensing from the agency with a mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.
8. Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!
9. Ideally, automatic and semi-automatic weapons should be removed from the market entirely and not manufactured in the first place.

Thanks for your consideration.

Jean Lindgren

San Francisco, CA

Email: lindgren.b8@gmail.com



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942b-es0y Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0423

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Terrie Williams

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## General Comment

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[ii] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government -- i.e., taxpayers -- will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain

rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.<sup>[iii]</sup>

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942f-pfzz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0424

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rebecca Berlant

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## General Comment

I am writing in opposition to moving export license oversight for firearms from the Department of State to the Department of Commerce because the proposed rule change treats semiautomatic assault rifles as non-military. This is despite the fact that U.S. troops routinely use their military rifles in semiautomatic mode, these weapons are used by state and non-state groups in armed conflicts, and the civilian possession of such weapons is prohibited in many countries. The proposed rule also: eliminates Congressional oversight for important gun export deals; transfers the cost of processing licenses from gun manufacturers to taxpayers; and, enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. The proposal reduces transparency and reporting on gun exports and transfers gun export licensing from an agency with a mission to promote stability, conflict reduction, and human rights, to an agency with a mission to promote trade and which lacks the resources to adequately enforce export controls.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not fewer.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942g-x628 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0425

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Garry Black

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## General Comment

I whole heartedly support moving the small arms ammunition control from the State Department to the Commerce Department. The Bureau of Industry Control in Commerce will adequately monitor the shipment of these items.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942g-i5tc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0426

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Deirdre Dreslough

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## General Comment

Please leave the regulations as they stand. The more oversight for weapons sales and exports, the better. This is just a play for profits by a few organizations and companies and the USA, and the pain and inhumanity these weapons will bring to other nations will be a stain upon our national soul; all our souls. If anything, increase regulations on weapons exports, or eliminate them entirely. Please uphold the peaceful wishes of the majority of Americans.

"I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house."

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942g-nv6o Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0427

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Don't export our firearms problems. Don't further line the pockets of the merchants of death.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942h-zfob Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0428

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Angel Marks

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942h-ngnl Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0429

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Suzanne Darweesh

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## General Comment

Is this the reputation we want as the leading economy in the world, to be producer and exporter of arms and military supplies? I think not. Remember how the world respected us during and after the Marshall Plan. Let's change our reputation to one that accepts refugees and promotes the economies of developing nations so that they can achieve self-sufficiency, jobs and food for their own people and the migration of people seeking a better life and safe existence will decrease. We produce more weapons than the next 5 economies put together! What a reputation! I am opposed to any sale of weapons to any third world countries.

# PUBLIC SUBMISSION

<b>As of:</b> November 29, 2018 <b>Tracking No.</b> 1k2-942h-eq7t <b>Comments Due:</b> July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0430

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Pamela Johnston

**Organization:** i.am.not.a.company

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## General Comment

I wish to speak out against this proliferation of weapons used in war and crime, as follows:

Treats semi-automatic assault rifles as non-military, despite their use by U.S. troops, their use by state and non-state groups in armed conflicts, and their prohibition for civilian possession in many countries.

Eliminates Congressional oversight for important gun export deals.

Transfers the cost of processing licenses from gun manufacturers to taxpayers.

Removes statutory license requirements for brokers, increasing risk of trafficking.

Reduces or eliminates end-use controls, such as State Depts Blue Lantern program, and by eliminating registration of firearms exporters, a requirement since the 1940s.

Enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms.

The Commerce Department does not have the resources to enforce export controls, even now.

Reduces transparency and reporting on gun exports.

Transfers gun export licensing from agency with mission to promote stability, conflict reduction, and human rights, to an agency with mission to promote trade.

Firearms are used to kill a thousand people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942h-gjzv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0431

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Cynthia Hood

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one else asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942h-n6kg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0432

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose the proposed rule for the following reasons:

The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts, causing enormous damage. U.S. troops use rifles in semi-automatic mode an overwhelming amount of the time. Regarding wide retail availability of firearms, about which comment has been requested, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Six U.S. states the District of Columbia, and several large retail chains also prohibit retail sale of semi-automatic assault rifles. Many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

The proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons. That will limit its ability to comment on related human rights concerns, as it recently did on the Philippines and Turkey.[ii] Congressional action in 2002 required sales of firearms regulated by the US Munitions List valued at \$1 million or more be notified to Congress. Items moved to Commerce control would no longer be subject to such notification. In a September 15, 2017, letter, Senators Benjamin Cardin, Dianne Feinstein, and Patrick Leahy explicitly noted that this move would violate Congressional intent and effectively eliminate Congress proper role.

The new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Registration fees that since the 1940s have been used to offset the costs to the government of tracking who is manufacturing weapons would no longer apply to manufacturers of semi-automatic weapons, and Commerce does not charge any fee for licensing. So the government -- i.e., taxpayers -- will absorb the cost of reviewing applications and processing licenses. Gun exporters that benefit from these sales should shoulder this cost.

National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons. There is good reason for concern that firearms brokers will no longer be subject to US brokering law. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking. That will make it easier for unscrupulous dealers to escape attention.

The rule reduces end-use controls for gun exports. It would eliminate the State Departments Blue Lantern program for gun and ammunition exports, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It also would move license approval out of the department that compiles the U.S. Governments information on human rights violations, reducing the ability to effectively deny weapons licenses to international human rights violators. End-use controls also are weakened by eliminating registration of firearms exporters, a requirement since the 1940s. Registration of exporters allows the State Department to check an exporters history whenever a manufacturer or broker requests a license for a particular gun export sale. But the transfer of licensing to Commerce will remove new exporters and brokers of these firearms from the State Department database, weakening enforcement against arms trafficking.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for 3D-printing weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The Commerce Department is unlikely to make the same argument once those weapons are transferred to their control. Unless corrected, the new regulations run the risk of effectively condoning and enabling 3D printing of firearms in the U.S. and around the globe. By effectively eliminating many means to detect firearms, background checks on domestic sales and end-use controls on international exports for such weapons, this change could generate many preventable tragedies.

The export of these weapons should be subject to more controls, not less.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942i-tbw3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0433

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Karri Allen

**Organization:** Raytheon Company

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## General Comment

Please see attached.

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## Attachments

Raytheon Company Comments DDTC USML Cat I II III (83 Fed Reg 24198) (filed 2018-07-03)



July 3, 2018

U.S. Department of State  
Directorate of Defense Trade Controls  
PM / DDTC, SA-1 12th Floor  
2401 E Street, NW  
Washington, DC 20522  
*Via: [www.regulations.gov](http://www.regulations.gov)*

**Subject: Raytheon Company Comments on USML Categories I, II, and III**  
**Ref: 83 Fed. Reg. 24198 (May 24, 2018)**  
**Docket ID: DOS-2017-0046**

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On May 24, 2018 the Department of State, Directorate of Defense Trade Controls (“DDTC”) requested comments from the public on the proposed rule to amend United States Munitions List (“USML”) Categories I, II, and III. Below please find comments from Raytheon.

### **USML Category II**

Raytheon strongly supports the addition of Note 2 to paragraph (a) and the Note to paragraph (j)(9) because they help distinguish Category II items from items more appropriately controlled in other USML Categories. Regarding Note 2 to paragraph (a), we recommend the modifications underlined below to utilize the same language from Category VII (i.e. add the words “and trailers”) to direct that guns and armament when affixed to trailers that are armed or are specially designed to be used as a firing or launch platform to deliver munitions or otherwise destroy or incapacitate targets are otherwise controlled under Category VII. Directly similar to the concept currently embodied in the Note 2 to paragraph (a), we recommend that language be added to this Note to clearly indicate that active protection systems specifically defined in categories associated with the carrier are controlled under those other categories.

Note 2 to paragraph (a): Guns and armament when integrated into their carrier (e.g., ships, ground vehicles and trailers, or aircraft) are controlled in the category associated with the carrier. Similarly, guns and armament when integrated into an active protection system described in the category associated with the carrier are controlled in the active protection system category associated with the carrier. Self-propelled guns and armament are controlled in USML Category VII. Towed guns and armament and stand-alone guns and armament are controlled under this category.

Regarding the Note to paragraph (j)(9), we recommend the following modification (underlined below) to continue the drive for clarity:

Note to paragraph (j)(9): For weapons mounts specially designed for ground vehicles, see Category VII. For weapons mounts specially designed for vessels, see Category VI.



Raytheon Company Comments on Proposed Rule - USML Categories I, II, and III

July 3, 2018

Page 2 of 2

### **Brokering**

The conforming change proposed for 22 C.F.R. § 129.1(b) improves readability. The proposed language for 22 C.F.R. § 129.2(b)(2)(vii) appears to provide a broad carve-out to the brokering activities definition. It would be helpful for DDTC to clarify whether this language was intended to convey that any ITAR or EAR approval for the items in question is sufficient to meet this criteria and that the approvals do not have to list the specific consignees or end users as the future export, reexport, or transfer. If this was not what was intended, then the proposed language for 22 C.F.R. § 129.2(b)(2)(vii) should be modified to indicate this, such as (additions underlined):

(vii) Activities by persons to facilitate the export, reexport, or transfer of an item subject to the EAR that has been approved pursuant to a license or license exception under the EAR or a license or other approval under this subchapter involving only parties approved under that license or other approval.

### **Effective Date**

Raytheon strongly supports using a delayed effective date of 180 days as has been done for other USML to CCL transitions. Such transitions require updates to IT systems, policies, processes, and training which require time to complete. Based on experiences in performing these tasks during previous transitions, the full 180 days is necessary.

We appreciate the ability to comment and thank you for your partnership.

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942j-61z5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0434

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sandra Derr

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## General Comment

Why are we the world's #1 arm producer and sales to others!

We should be selling plows instead of "swords."

NO MORE SALES OF GUNS needed in this heavily armed world.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942j-t1e8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0435

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Adele Riffe

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## General Comment

The Trump administration has proposed to make it easier for U.S. gun makers to export guns and ammunition globally, even though U.S.-exported firearms are already used in countless crimes, attacks and human rights violations in Latin America, the Middle East, Africa and around the world.

The proposal would move export licenses for semi-automatic assault weapons, sniper rifles, and other powerful firearms from the State Department to the Commerce Department, removing Congressional oversight, weakening controls on who ends up with the weapons and even lifting restrictions on 3D printing of guns that would permit production of guns both overseas and here at home. The U.S. gun industry and the NRA have pushed hard for these changes to make up for falling gun sales. The Commerce Department estimates that the proposed change would apply to 10,000 gun export applicants a year.

Please do not allow any weakening of controls or restrictions on gun and ammunitions licensing, sales and/or production - either nationally or abroad. We need common-sense restrictions on guns. The NRA just wants to sell more guns, to improve its profits. It does not care that its actions have direct consequences on our lives, increasing the probablitiy that someone we love might be involved in gun-related violence.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942j-mqd9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0436

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Marie Lucey

**Organization:** Franciscan Action Network

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## General Comment

My name is Marie Lucey and I am a Catholic Franciscan Sister , Assistant Director of Franciscan Action Network (FAN) based in DC with thousands of members across the country. We are a member of Faiths United to Prevent Gun Violence and take every opportunity to address the gun violence epidemic in our country so wish to oppose the proposed rule for many reasons including the following:  
State and Commerce Departments have different missions, roles and purposes.

The proposed rule would eliminate Congressional oversight for major gun export deals and would limit the ability of Congress to comment on related human rights concerns. In a September, 2017 letter, Senators Ben Cardin (Senator of MD in which I reside), Feinstein and Leahy noted that this move would violate Congressional intent and eliminate Congress' proper role.

The rule enables unchecked gun production in the U.S. and exports abroad by removing the block on 3D printing of firearms. Unless corrected, the new regulations run the risk of condoning and enabling 3D printing of firearms in the U.S. and elsewhere.

Firearms are used globally to kill a thousand people every day in acts of organized crime, political violence, terrorism, and human rights violations. Military-style assault rifles and ammunition, which would be transferred to Commerce control, are weapons of choice for criminal organizations in Latin American countries that are responsible for most of the record levels of homicides in these countries. Export of such weapons should be subject to more, not fewer, controls.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942j-5gd7
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0437

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Karen Wolff

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942k-gpzt Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0438

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security. The rules elimination of congressional oversight of commercial weapons sales of \$1 million or more is also reckless. This rule has one purpose only: to garner profits for a U.S. gun industry that is faring poorly in the domestic market. It comes after years of lobbying by the NRA and National Shooting Sports Foundation. No one elsed asked for it or wanted it. The NSSF, the trade group for the gun industry, has already boasted the rule would lead to a 20% increase in American gun exports. We see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. These weapons were not designed for household use, they were designed to kill en masse on the battlefield. That is why they are the weapons of choice for mass shooters. If you go forward with this disastrous policy, I will do everything in my powerpeacefully and democraticallyto hold your leadership accountable for the resulting global bloodshed. That will include advocating against your budget priorities across-the-board until a new, non-corrupt administration can come in and clean house.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942k-x1je Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0439

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Val Mobley

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## General Comment

Moving this function to Commerce is a frightening idea. There will be no checks or safeguards to keep these weapons out of the hands of foreign powers whose intentions cannot be known. These weapons can likely end up in the hands of those who would harm our country. The sale of these weapons must be more than just an economic decision. The Department of State is the only agency who can maintain the safety of the US. This idea is an obvious ploy of the gun lobby to remove any semblance of regulation. Please don't fall for this!



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942k-6hrv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0440

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Susan Hornik

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## General Comment

I am extremely concerned with gun violence against civilians both within the US and around the world, and I strongly oppose moving export licenses of assault weapons and other powerful firearms from the State Department to the Commerce Department. The proposed rule treats semi-automatic assault rifles as non-military. But many state and non-state groups in importing countries use semi-automatic rifles in armed conflicts so this is a fiction. Additionally, many semi-automatic rifles are also easily converted to fully automatic firearms. Because military-style assault rifles clearly have substantial military utility, transfer of these firearms to Commerce Department control is inconsistent with the statutory framework enacted by the Congress to regulate the export of arms.

In fact, the proposed rule would eliminate Congressional oversight for important gun export deals. Congress will no longer be automatically informed about sizable sales of these weapons.

Additionally, many countries prohibit civilian possession of semi-automatic rifles and handguns, as well as of any larger caliber firearm. Hence, there is reason for considerable concern that firearms brokers will no longer be subject to US brokering law. National laws for brokers and financiers who arrange firearm shipments are a weak link in the chain of efforts to curtail trafficking of small arms and light weapons now. Although Commerce states it will retain rules on brokering for a State Department list that includes assault rifles, there is no statutory basis for brokers of these weapons to register and obtain a license, increasing the risk of trafficking.

Finally, the new rules would transfer the cost of processing licenses from gun manufacturers to taxpayers. Why should citizens pay for gun exporters to profit? It's another absurd example of corporate welfare.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942k-7e79 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0441

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ben Soreff

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## General Comment

I strongly urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war. Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942k-kovh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0442

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Fred Sigworth

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## General Comment

Please maintain restrictions on the export of firearms!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942k-so2i Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0443

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Roslyn Kaplan

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## General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942k-e47a Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0444

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kenneth Foscue

**Organization:** CT Department of Public Health

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## General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942k-ock9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0445

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elizabeth Gibbs

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## General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942k-oawz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0446

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kirsten Bechtel

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## General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942k-8cct Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0447

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Claire Matthews

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## General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942k-u5tm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0448

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Alexa Tomassi

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## General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942k-5lbn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0449

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** William Steinmayer

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## General Comment

I firmly oppose the decision to move the oversight on the sale of assault weapons from the State Department to the Department of Commerce. These weapons are strictly for military use, and should be treated as such.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942k-wev4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0450

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Peter Gottschalk

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## General Comment

The loosening of firearm export rules fuels violence around the globe. There are two compelling reasons to not do so:

1. The basic moral wrong perpetuated by providing more lethal weapons used in ways that kill civilians and destabilize societies.
2. While most Americans may not appreciate the havoc wrought by our weapon exports, people across the globe recognize the weapons used to harm their families and friends, and damage their societies and economies. Many people understand who are the manufacturers of specific armaments and associate the nations from which they originate with the violence they perpetuate. This is a grassroots foreign policy disaster for the United States.

Please maintain if not strengthen the rules already in place.

Thank you for your consideration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942k-8ew8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0451

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Peter Hanson

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## General Comment

Please keep gun exports accountable and having oversight. Let's not export murder.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942k-j2hh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0452

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Bert Goff

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## General Comment

I urge the State Department to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942k-6zwx Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0453

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jeremy Stein

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## General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war. Guns do not make us safer. Exporting more guns outside of the US would only make the rest of the world suffer the same amount of gun violence that is plaguing the US.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942l-edn2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0454

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kathy Chase

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## General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942l-s69j Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0455

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

As a defense industry supporter, I support the movement of Category III small arms ammunition regulation from the State Department to the Commerce Department Control List of the Bureau of Industry and Security.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942l-8x7o Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0456

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jason Miller

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## General Comment

My name is Jason Miller and I am the Director of Campaigns and Development at the Franciscan Action Network in Washington, D.C. As a person of faith, I am extremely disturbed that guns are a major export of the United States and believe that gun export regulation is important. I oppose the proposed rule change because as Pope Francis said: there is a piecemeal world war III currently being waged and the United States is one of the biggest players. Instead we must work for diplomacy and peace.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942l-xsey Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0457

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sloane Levy

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## General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942l-ghmo Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0458

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jay Hoggard

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## General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942l-bdsg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0459

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** James Curry

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## General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942l-d9ic Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0460

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Erin Freed

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## General Comment

I am writing to oppose changing the rules so as to make it easier for U.S. firearm manufacturers to export assault rifles and other guns. We need the valuable oversight and accountability that is provided by the current law.

With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942l-36qo Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0461

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ken Overton

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## General Comment

As a defense industry supporter, I support the movement of Category III small arms ammunition regulation from the State Department to the Commerce Department Control List of the Bureau of Industry and Security.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942l-op0g Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0462

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Susan Hosack

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## General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942l-f3uu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0463

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Scott Schweizer

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## General Comment

As a veteran of the Persian Gulf War and a registered Republican I strongly oppose the export of guns. Please stop and oppose the gun lobbys agenda of profits over everything else.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942l-phbf Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0464

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Henry Lowendorf

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## General Comment

Our guns kill children everywhere. The government of the U.S.A. should not be in the business of promoting distribution of weapons around the world.

# PUBLIC SUBMISSION

<b>As of:</b> November 29, 2018 <b>Tracking No.</b> 1k2-942m-o3mv <b>Comments Due:</b> July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0465

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Margaret Brown

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## General Comment

I am strongly OPPOSED to relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. Gun violence is a major killer, taking the lives of 1,000 people around the world every day! We should be making it harder, not easier, to export U.S. made weapons of war.

# PUBLIC SUBMISSION

<b>As of:</b> November 29, 2018 <b>Tracking No.</b> 1k2-942m-o5tn <b>Comments Due:</b> July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0466

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Star Star

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## General Comment

switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Submit comments now to the State Department and the Commerce Department opposing the rule change.

\*You can copy and paste the points in this email or use your own voice to make unique comments to the State and Commerce Departments.

U.S. Department of State: <https://action.momsrising.org/go/38289?t=10&akid=11002%2E2254141%2Ezo8aRS>

U.S. Department of Commerce: <https://action.momsrising.org/go/38290?t=12&akid=11002%2E2254141%2Ezo8aRS>

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942m-topd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0467

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Cindy Ware

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## General Comment

I strongly urge our United States Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability.

Gun violence is a real and ever-increasing threat both here and abroad. I do not want our government to make it easier for American guns to cause tragedies either here or abroad.

We all should be making it HARDER, not easier, to export U.S. made weapons of war.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942m-5md2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0468

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jean G. Cochran

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## General Comment

I oppose sales f arms to other countries. This simply escalates dangerous warfare and endangers peaceful people.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942m-dw5v Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0469

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** TAINA LITWAK

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## General Comment

I am very concerned. Right now, firearms exports are classified as military so they are under the regulation of the State Department. Congress can block sales of large batches of firearms to foreign countries. This is an important thing for the security of this country. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, or even countries who's real interests are not friendly towards the US.

Commerce Department just does NOT have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere like the State Dept. does. This means that it will become easier for firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents to obtain large caches of American guns and ammunition.

Please do not do this.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942m-p864 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0470

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Alexandra Sarason

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## General Comment

I oppose the rule change that brings regulation of firearms int'l sales away from US Dept of State to US Commerce Dept. Our international safety cannot afford opening sales of military arms to terrorist organizations which would happen if US Commerce Dept oversees the regulation.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942n-3r9o Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0471

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Darwin Busa

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## General Comment

It makes no sense to move export controls on military useful weapons from State to Commerce. I am totally opposed to this proposal.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942n-wmrp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0472

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Susan Connors

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## General Comment

The handling of export licenses of semiautomatic assault weapons and other powerful firearms must remain in the hands of the U.S. State Department for the security of our country. Trafficking in Arms would strengthen the enemies of the United States. Please fight to keep this control and not let it transfer to the U.S. Department of Commerce!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942n-m3c8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0473

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kevin Kelly

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## General Comment

Don't listen to the NRA.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942n-jh11 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0474

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Firearms trafficking needs to stay under the State Department to control where the firearms go for the publics safety

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942n-luh6 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0475

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** CJ Horner

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

WHAT THE HECK IS HAPPENING TO THIS COUNTRY????!????!!!!?????????

Please, in the name of all that's holy, DO NOT DESTROY the carefully constructed structure that has been put in place to create protection for not only citizens of the USA, but for the world at large.

I beg this of you. I feel hope starting to die in me. Please reestablish my ability to hope for a better America and a better world.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942n-pujc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0476

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

This is clearly not something that should be left up to any corporate interests, we need to keep firearm regulations in the state department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942n-4mfb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0477

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jonathan Holland

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## General Comment

I believe this change of authority is a poor move for America and I oppose it. Thank you for your consideration.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942n-l98d Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0478

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Stuart Rubinow

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## General Comment

I oppose the proposed rule change that would switch the regulation of firearms export from the U.S. State Department to the U.S. Commerce Department. But these two departments have very different mandates: State to safeguard our nation, and Commerce to promote American businesses. Assault weapons should not be seen as just another product to be promoted, bought, and sold like washing machines or any other consumer product. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942n-obm2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0479

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Susan Civitelli

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## General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942n-ra4l Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0480

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary Fosse

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. .

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942o-k2sh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0481

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Tiffany Hiranaka

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## General Comment

I am writing this comment in support of the this proposed rule. I feel that this proposed rule will be very beneficial to the U.S. I support this proposed rule for a few different reasons. I feel that if the ITAR and EAR imposes license requirements on exports and reexports, there will be a better handle of all items on the U.S. Munitions List (USML). Having a better handle on this situation could help to keep weapons and ammunition out of the hands of people who should not posses those items. This will also help the government to maintain the list of all individuals that holds a license, ensuring that applications are correctly completed, and the proper background checks are conducted prior to issuing the license.

Another things that I support about this proposed rule is the requirements of Section 38(b)(1)(A)(ii). The requirements to this section will ensure that all business owners engaged in brokering activities are registered and licensed with the Arms Export Control Act (AECA). I feel that this is another benefit of the proposed revision because it ensure that all business are properly registered to conduct such brokering activities. I feel that this is important because our government will be able to closely maintain all business conducting such activities. This will ensure that these items dont get into the hands of groups or individuals that should not possess them.

I think that this rule will greatly impose on businesses and individuals If adopted. I think that businesses may feel that this is another way for government to charge them for something else. This in turn may cause businesses to shut down due to the costs being greater than the profits. Although this may cost people more, I feel that it would have a better regulation over all of the items on the USML that are imported and exported. This will also impact individuals who hunt for recreation purposes. This will make it a little more challenging for them to attain weapons and ammunition. Again, although these proposed change will affect business and individuals, I feel that the benefits outweighs the costs. Making this a rule that I feel should be passed, not to make things more difficult for people; but to ensure the safety of others.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942o-a1o5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0482

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Marguerite Ritchie

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## General Comment

I oppose the change in rules in the regulation of exporting firearms from the U.S. State Dept. to the Dept. of Commerce. This would not allow Congress to be notified and block any shipment of large caches of firearms to be exported to foreign countries thus enabling dangerous entities such as terrorist groups, organized crime and traffickers to prevail and is matter of national security.

The U.S. Dept. Of Commerce is ill equipped as it lacks the resources and field offices to take on such an endeavor of regulating large export of firearms from so many possible locations.

I feel it would be a mistake to change the current rules and accountability.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942o-gevb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0483

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Vincent Ferri

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## General Comment

I am absolutely opposed to the proposed rule to transfer oversight of non-military firearm exports from the State Department to the Commerce Department. It is a transparent move to ensure windfall profits for the U.S. gun industry. The multi-year lobbying campaign by the NRA and National Shooting Sports Foundation to expand the reach and power of the gun industry will increase gun sales over 22% without the needed oversight by Congress to guarantee that these weapons do not find their way into the wrong hands.

Only the gun lobby asked for this change. It would make U.S. exports of small arms far more dangerous, by transferring oversight responsibilities to an agency that prioritizes business over national security. And, the conflict of interests posed by that transfer will pit NATIONAL SECURITY, IMMIGRATION STABILIZATION, AND THE MAINTENANCE OF DEMOCRACY AROUND THE WORLD AGAINST ARMS INDUSTRY CORPORATE PROFITS.

The U.S. Congress would voluntarily abdicate its Constitutionally mandated obligation to oversee commercial weapons sales of \$1 million or more.

However, I am in favor of the declassification of semiautomatic rifles as assault weapons, and support their classification as civilian products. As a combat veteran I am experienced enough in the classification and use of firearms to understand that a semi-automatic weapon is not an assault weapon and is most certainly not the kind of weapon I would use in a combat situation.

The AR15 series of semi-automatic rifles simply is not a battlefield weapon suitable for our troops in the field and because of that they are not the issued weapon for our combat troops in the field. By definition they are not assault weapons, and regulation of them because of the way they LOOK or how the unschooled public perceives them as "SCARY," is not a logical basis for regulation of these weapons separate from other semi-automatic rifles. These are not REAL categories; they are only excuses to make it appear that legislators are taking step in the direction of gun control.

There are clearly many important sensible and REAL gun control measures that would enhance public

safety and curtail the number of mass shooting incidents. Waiting periods should be mandated to last as long as a thorough background check would take to complete, tight regulation of gun show sales, no gun ownership or license for those under 21 years of age, and full responsibility for any adult who allowed a minor 21 years of age or younger to have access to a firearm of any kind are all measures that should be adopted.

The AR15 series of semi-automatic rifles have been used by criminals and people with psycho-social disease to kill innocent children and our loved ones, but the facts are that these criminals will use whatever weapon is available, as in the most recent devastating shooting incident in Annapolis. In almost every case of mass shooting in the United States and other countries, the threat posed by the criminal perpetrators were well documented, and the failures of responsible authorities are clearly evident. Those authorities must be held criminally accountable for their failings.

The State Department is the only agency that should be responsible for international sales [as defined in the current controlling laws] and relative to international sales MUST remain the controlling agency. Further, the potential National Security threat from international firearms sales that have no serious oversight, as would be the case if the Commerce Department were to assume this role, absolutely requires Congressional oversight and Congress must exercise its power and responsibility as an important element of our Constitutionally mandated system of Checks and Balances.

Important references:

Trump move would make it easier for U.S. gun manufacturers to export firearms,  
<https://action.momsrising.org/go/38291?t=13&akid=11002%2E2524772%2E0kwGD5> The Washington Times, May 14, 2018.

Trump wants to make foreign arms sales easier,  
<https://action.momsrising.org/go/38292?t=14&akid=11002%2E2524772%2E0kwGD5> The Boston Globe, June 23, 2018.

American Guns Drive the Migrant Crisis That Trump Wants to Fix With a Wall,  
<https://action.momsrising.org/go/38293?t=15&akid=11002%2E2524772%2E0kwGD5> The Trace, May 25, 2017.

The Trump administration proposes making gun exports easier. Here's how to submit your public comment on this dangerous proposal, <http://action.momsrising.org/go/38294?t=16&akid=11002%2E2524772%2E0kwGD5>  
Violence Policy Center.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942o-zu4c Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0484

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sandra Van Sant

**Organization:** Jeff Galloway Training - Jersey Shore

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## General Comment

I oppose the proposed rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I believe it is merely another attempt by the NRA to bypass our protection of national security.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942o-b3nt Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0485

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** jeffery anderson

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## General Comment

THIS would be the wrong move changing the classifaction of firearms to anything other than MILITARY.IT would no longer to be able to regulate sales of large shipments of firearms to persons and military in foreign countries from the UNITED STATES. firearms need to be regulated for the safety of american citizens and our countries security. thank you mr anderson

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942o-1ybo Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0486

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** anonymous Anonymous

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## General Comment

I am a concerned American and Connecticut citizen.

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942o-n21e Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0487

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Carla Lilley

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## General Comment

I oppose shifting the sale of arms from the State Department to Commerce. We do not need to Arm The World any more than we already have. It is 2018 and it is time to wean ourselves away from debilitating Wars. It will most certainly come back to bite us from a military and national security perspective.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking. More trafficking will most certainly Increase the refugee/immigration debacle we are currently experiencing as families try to escape violence in Central America. It will increase mass migration all over the Planet Earth. It will increae our debt to the point of national collapse. What then?

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Increasing the sale of weapons around the world will endanger the people of the United States. Is more money for gun manufacturers worth that? We will be the most hated country in the world if we do this. We have enough war in this world. It is time to limit the sale of weapons and work for Peace and Stability. It is time to use our brains and find alternative solutions instead of feeding the Corrupt War Machine. Stop the killing, stop the daying, stop the worldwide suffering of refugees.

Shame On All of You for even considering this. Carla Lilley, Pittsboro, NC

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942o-533y Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0488

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elissa Wagner

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-gah8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0489

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Peter van Dorsten

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## General Comment

I oppose a rule change that would switch the regulation of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-hlnm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0490

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Paul Johnson

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-q05h Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0491

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Doug Peltonen

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-s3me Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0492

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kate Hermann-Wu

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-9ixh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0493

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** michael tucker

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## General Comment

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-a9x2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0494

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Shawn Sapp

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## General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-anxq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0495

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** frank belcastro

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-nwjh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0496

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change; it will make the nation less safe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-9m0j Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0497

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Donna Knipp

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-dfve Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0498

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Gail Kennedy

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-ek5l Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0499

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** don r

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## General Comment

YES, MAKE IT EASIER TO KILL PEOPLE, TRUMP IS PULLING YOU FOOLS AROUND BY THE NOSE!  
COWARDS

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-cxkd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0500

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Molly Swabb

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## General Comment

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-1wzx Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0501

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Deborah Garber

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## General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-vbnq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0502

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anna Franz

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## General Comment

Please keep gun exports under the State Department. Enough of our weapons wind up in enemy hands as it is.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-ohng Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0503

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** A. B.

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## General Comment

STOP SERVICING PUTINS FUNDED nra traitors. Wth is wrong with you. Serving PUTINS lapdog and his menagerie of traitors. Embedded infesting our government.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-uy9x Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0504

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Alyssa Melton

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-vocy Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0505

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Carol Nau

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## General Comment

The rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

These changes do not align with our desire for a safer society.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-i44m Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0506

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kristin Kokal

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-i5y2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0507

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Linda Bronstein

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## General Comment

I oppose this rule change that would switch the regulation of firearms export from the U.S. State Department to the U.S.

Commerce Department. The rule change would facilitate firearms exports to oppressive regimes, remove safeguards that help

keep organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries

and causes mass migration. Firearms are used to kill people every day around the world in acts of organized crime,

political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

<b>As of:</b> November 29, 2018 <b>Tracking No.</b> 1k2-942p-5sg8 <b>Comments Due:</b> July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0508

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Matthew Tarpley

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-wwlr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0509

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary Sisson

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Do not allow this to happen!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-3qwj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0510

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joe Pfister

---

## General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-fen2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0511

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** bruce miller

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## General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

[1] Trump move would make it easier for U.S. gun manufacturers to export firearms, The Washington Times, May 14, 2018.

[2] Trump wants to make foreign arms sales easier, The Boston Globe, June 23, 2018.

[3] Ibid., The Boston Globe

[4] American Guns Drive the Migrant Crisis That Trump Wants to Fix With a Wall, The Trace, May 25, 2017.

[5] The Trump administration proposes making gun exports easier. Heres how to submit your public comment on this dangerous proposal, Violence Policy Center.

[6] Ibid., Violence Policy Center.

[7] "U.S. requires group to remove 3-D gun instructions from its website," CNN.com, May 13, 2013.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-c93v Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0512

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Dan Hubbard

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## General Comment

I am adamantly opposed to this change. Our gun culture is absurd.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-10uh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0513

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Diane Virzi

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## General Comment

Stop the exportation of weapons of mass distruction. We don't need to expand the carnage we love with here to other countries.

# PUBLIC SUBMISSION

<b>As of:</b> November 29, 2018 <b>Tracking No.</b> 1k2-942p-fs6e <b>Comments Due:</b> July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0514

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Steve Hoelke

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## General Comment

This is a BAD idea!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-bbu3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0515

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Betty Lo

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-kwyn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0516

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lisa Atkinson

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Thank you.

Sincerely,

Lisa Atkinson



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-kbnl Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0517

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lawrence Bojarski

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-fpw Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0518

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Marsha Balian

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. You can also copy and paste in other parts of this email, too, in order to make your case.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-sn5p Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0519

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jason Fish

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-8s8f Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0520

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Valerie Dorrian

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-1y98 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0521

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joan Balfour

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## General Comment

A rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business) would open new floodgates for arms sales internationally, with serious implications for our national security.

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-wwi2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0522

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Diane Williams

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## General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-a6s9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0523

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elizabeth Kikuchi

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## General Comment

The NRA should be paying into the cost of making our schools safe instead of having the taxpayers foot this bill. I consider them directly responsible for this problem!!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-1bcj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0524

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Scott Coahran

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## General Comment

With the unending series of wanton, violent acts that are committed, it seems, on at least a monthly basis, the last thing we need is something that will expedite the purchase and ownership of guns for the sake of commercial profit.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-e1kh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0525

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** meghan e

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

No more violence!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-409c Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0526

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** jody berman

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-451i Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0527

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Tatum Hammer

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-dwdb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0528

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Cathy Wootan

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## General Comment

As a mother, grandmother and former social worker, I am appalled by our country's inability to get a handle on gun violence.

I'm tired of hearing that the problem isn't guns, it's mentally ill people. Every country in the world has its share of mentally

ill citizens -- and their proportions are pretty much the same in every society -- and yet the US is the only developed country

that has routine mass shootings. That tells me it's about the guns, so that's where we need to start.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-hppd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0529

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kyrie Collins

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## General Comment

I vehemently oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The Commerce Department just does not have the resources to adequately enforce export controls. Firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. It can not be permitted!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-6g84 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0530

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lois Johnson

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. Furthermore, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-o59o Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0531

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Steve Graff

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## General Comment

This control is still warranted. This is a gave away for weapon manufacturers.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-g8dj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0532

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** David Morris

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## General Comment

Changing firearms regulation and classification as proposed in this rule would be the height of madness. It is a blatant attempt by the NRA and gun manufacturers to pull a runaround maneuver. Under no circumstances should firearms be reclassified. Their sale and export should remain the purvey of the US Government and Congress. Doing anything else would open a floodgate of arms shipments to all kinds of dangerous forces outside the US. Please, please do not consider even the possibility of changing the current ruling.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-mhqr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0533

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Pamela McIntyre

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## General Comment

I disagree with the proposed change. This would make our gun control issue worse and share the problem!

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942p-w547
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0534

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Beth Stout

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## General Comment

I oppose the rule change to switch firearms export regulations from the US State Department to the Commerce Department. This change would allow large weapons sales abroad without regard to national security or taking human rights violations into consideration. The Commerce Department is not adequately funded to manage this oversight and leaves the US without sufficient control over arms sales that could go to terrorists and organized crime syndicates. This is just a plain bad idea.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-pztd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0535

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Marsha Anonymous

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## General Comment

I wont paste a form letter, but I will say, do the right thing, say no to all changes right now, this is wrong, the NRA is wrong. Don't be like the NRA, be a PATRIOT, do the right thing.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-4s4w Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0536

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** L Hernandez

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## General Comment

This would be a very bad move. There are already too many automatic and semi-automatic weapons in the wrong hands.

Automatic weapons have no business in the hands of the general public in the United States, let alone around the world.

Only military and police personnel should have the automatic type weapons. Bump-stocks should be banned, period.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-6cfp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0537

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** KARIN WINSTON

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## General Comment

Exact opposite of what we should be doing. We already supply too many weapons to criminals and gangs in south and Central America- which is why the innocent civilians are at our doorstep in the first place. Now they want to make it easier to send more? The NRA isnt satisfied with 33000+ American deaths per year? Plus another 75,000 injuries?

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-37qq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0538

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Marci Diamond

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## General Comment

I strongly oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Control of the export of firearms that could fall into the hands of those who would harm Americans is a national security issue.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-8eog Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0539

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Richard Sparkes

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## General Comment

I completely oppose any rule changes that would transfer the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. American firearm manufacturers cause enough bloodshed and violence here at home. There is no reason this mayhem should be easier to export to peaceful, civilized and non-violent nations. Thank you very much.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-mx8y Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0540

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Suzanne Slattery

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.



# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942p-b52d
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0541

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** c. martinez

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## General Comment

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-d206 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0542

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Marjean Doden

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## General Comment

Why spread our violence problems to the rest of the world? Keep this under the Department of State!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-36vo Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0543

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Edward Costello

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## General Comment

I oppose the regulation change that would shift gun export responsibility to the Commerce Dept. State Dept has handled it well in past. No need for change.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-rsfn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0544

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nancy Holbert

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-zn6o Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0545

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Roderic Krapf

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## General Comment

I am very much opposed to the new rule change that gives the Commerce Department control over the export of firearms. More weapons anywhere in the world have not caused bad situations to be better, but rather, to make them worse. Arms manufacturers are only interested in profits, not human lives or volatile political crises that could result in thousands of deaths.

The easy access to guns in America helps keep us number 1 in the world in citizens killed by guns. Other places in the world do not need the means to excel at such grisly numbers.

I trust the State Department to make better choices on export of firearms.

# PUBLIC SUBMISSION

<b>As of:</b> November 29, 2018 <b>Tracking No.</b> 1k2-942p-uzci <b>Comments Due:</b> July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0546

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Barb Crumpacker

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## General Comment

Gun limits are important for the safety & peace of mind of citizens of the world.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-o7ll Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0547

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Susan Heath

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## General Comment

I oppose the rule change that would switch the regulations of firearms exports from the State Department to the Commerce Department. Our State Department is much better suited to deciding these matters and has been doing so for years. The world is dangerous enough without making this switch.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-visu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0548

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sarah Hearon

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-v8oh Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0549

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Patricia Abrahamsen

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms should be considered as a controlled substance given the potential for them to be used to harm our allies or used against our national interests. Strict regulation is necessary to ensure that weapons do not end up in the wrong hands.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-m3gd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0550

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ann Rushton

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## General Comment

Permits for sales of arms overseas should be based on sound American policy putting safety of Americans and American interests first and above all. A permitting process based on what is most profitable to gun manufacturers must be firmly rejected. They are responsible for too many deaths already. We should not be arming those around the world who will do even more harm.

A transfer of this process from the Dept of State to the Dept of Commerce for the financial benefit of manufacturers of weapons is completely contrary to legitimate American policy and interests.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-utml Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0551

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Patricia Bonney

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## General Comment

The thought of allowing unlimited sales, including allowing 3D duplicating of any firearms, is unbelievably appalling and terrifying. The potential for destroying billions of lives in a short time period is beyond measure. Eventually all the destroyers will have only each other to destroy, and the world will be devoid of people.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-948n Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0552

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Edith Simpson

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## General Comment

I am against moving regulation of exports of firearms to the Commerce Department.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-p2y1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0553

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Cheryl Herrick

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## General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The US should be finding ways to be a better neighbor and citizen in the world, not merely export violence in pursuit of profits.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-3i0n Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0554

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Helen & David Aminoff

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Isn't what is going on in our country bad enough?!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-z5wr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0555

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Barbara Van Walsen

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## General Comment

We should not export military arms. With the government we have, these exports might be used to send us into a war.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-nbzi Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0556

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Barbara Patchen

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## General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-cgiq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0557

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Bruce Wade

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## General Comment

Hello,

Speaking as a US Army veteran I think this is an extremely bad idea.

I'm concerned that this change from State to Commerce will export our American problem of gun violence to the rest of the world.

The easy access to deadly weapons is primary in the US and is core to our murder and suicide rates. The risk of a random person having a weapon is the justification by Law Enforcement's use of deadly force, even when the victim is cooperative.

The proposed change serves no one's interests except the weapons makers and their supporters.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-8bf5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0558

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Laurie Gates

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## General Comment

I oppose switching the regulation of firearms from the State Department to the Commerce Department. This action would make it easier for organized crime and terrorist organizations to purchase weapons and further fuel violence in oppressive regimes.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-rjot Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0559

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Julie Best

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-d5tk Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0560

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Richard Bartkowicz

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## General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-w5tv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0561

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Larry Norgaard

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## General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

- 1.It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
- 2.It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
- 3.It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-uyq4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0562

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Samuel Gerkin

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-zxg2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0563

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jennifer Valencia

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## General Comment

The State Department should handle firearm exports and licensing. It would be contrary to goals of the war against terror/ISIS to allow, for commerce's sake, the regulation of gun exports and licensure to be under the jurisdiction of the commerce dept.

This is common sense. Gun exports and licensure should stay under the purview of state, NOT commerce. -Jenn Valencia

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-gckw Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0564

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Linda Garcia

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## General Comment

I oppose this change of rules switching the authority from the State Department to the Commerce Department for regulating the export of firearms. This is extremely dangerous proposal and there has been no clear-cut rationale put forth for this change.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-wj70 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0565

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Michael Kemper

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## General Comment

The Unites States has a gun problem. Anyone who doesn't think so has been in a dark room for most of her life. The United States has the highest percent of gun ownership, the highest number of guns, extremely high rates of murder and gun related crime compared with most of the world. The United States government must take measures to address this problem. Making it easier to obtain a gun is not an answer, it is an abdication of responsibility to its citizens.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-9ply Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0566

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** robert norton

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## General Comment

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# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-x24w Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0567

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** David Gross

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## General Comment

I oppose the rule change that would switch the regulation of firearms exports from the U.S. State Department to the U.S. Commerce Department.  
Thanks.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-iak8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0568

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Craig Evans

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942p-7qww
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0569

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jennifer Lawson

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## General Comment

The United States must stand behind promoting peace at home and abroad. We must not switch the regulation of firearms exports from the State Department to the Commerce Department, facilitating firearms exports to oppressive regimes, removing safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. The United States must prioritize global stabilization and peace. Keep the regulation of firearm exports under the authority of the State Department and keep our country's security as a priority more important than short term profits. Thanks you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-nwns Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0570

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** RON FRITZ

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## General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-nt4c Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0571

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Toniann Reading

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## General Comment

I adamantly oppose this proposed rule change!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-25d6 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0572

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kevin Patterson

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I'm concerned that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-id1q Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0573

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Douglas Estes

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-fi5i Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0574

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Christopher Walker

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The rule change would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-3fmt Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0575

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Seeing as terrorist groups and other organizations accused of serious human rights violations have been able to make excellent use of non-automatic and semi-automatic low-caliber weapons, those sorts of firearms should remain on the USML. I strongly oppose the proposed rule change

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-movu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0576

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kay Smith

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## General Comment

I oppose this rule change that would switch the regulation of firearms export from the U.S. State Department to the U.S. Commerce Department. Sales of firearms to other countries should not be treated as a business matter.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-6w7s Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0577

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** JL Angell

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-xeka Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0578

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Tisa Anders

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. We need the State Department to continue with safety on this matter, not profits. In other words, let's continue to value and cherish people.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-pvw4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0579

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Claudia Cumes

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This is the opposite of the type of common sense change we need to see.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942p-31x5
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0580

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Karen Berger

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## General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

HERES THE LOW DOWN: Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.



# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942p-e62l
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0581

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary Lebert

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## General Comment

I am opposed to switching the regulation of firearms exports from the State Department to the Commerce Department as it would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-xzxs Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0582

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Faith Shafman

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. You can also copy and paste in other parts of this email, too, in order to make your case.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-a2ai Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0583

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** M. A. Maier

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## General Comment

I strongly oppose this rule change that would move the regulation of firearms exports from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

<b>As of:</b> November 29, 2018 <b>Tracking No.</b> 1k2-942p-tflx <b>Comments Due:</b> July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0584

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Barry Cheney

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## General Comment

I oppose the plan to change the licensing of weapon exports from the State Department to the Commerce Department. The world is flooded with too many weapons which fuel wars and terrorism. Please dont change this.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-ej9t Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0585

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Eugene O'Neill

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-2m5t Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0586

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Barbara Brown

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## General Comment

This is the most irresponsible action EVER to be taken by our Government. Let us show maturity for the sake of this world we live it. Almost Every day now there are mass killings and its only getting worse. Sit up and recognize the direction of this action. The NRA has enough money to be satisfied along with Donald Trump, our Dictator.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-98ul Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0587

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Leanne Yerby

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## General Comment

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. That is why I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-cpd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0588

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jennifer Godzeno

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-d5zk Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0589

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Pat Bliss

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## General Comment

I am opposed to allowing American semi automatic weapons to be sold over seas. Allowing the NRA to sell weapons overseas is insane. The NRA will be arming the very people that are killing our own people. Have you lost your minds?

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-i93s Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0590

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Randye Bloom

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

As a citizen who cares about the safety of our citizens as well as people all over the world I ask you to act in our behalf keep guns out of the hands of people who have no right to own them. Hero semi automatic weapons out of the hands of people who are not protecting our citizens. We have had massacres in our country. Do not allow this to continue. History will show what happened in our country. Do the right thing and protect all citizens everywhere. Stand up and be counted as one of the brave and good people.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-z24a Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0591

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sherry Schiebel

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## General Comment

I believe that guns in the wrong hands are the cause of the recent rash of mass murders. We must never allow unfettered access to weapons of any kind. But now that AR15 assault weapons, and bump stocks which allow the conversion of single round shot weapons into multiple shot weapons, we need to make restrictions on ownership stronger, not weaker.

Please think of all the children killed by those whose only form of expression is violence. Please think about all those families who have lost mothers and fathers. This was something that could have been prevented if there were waiting periods that would allow background checks to limit the purchase of guns to responsible individuals. But we also need to eliminate AR 15's and bump stocks from the market place.

If it were you child or parent who died, I believe you might have a different perspective.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-iuo7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0592

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous anonymous

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## General Comment

I am writing to IMPLORE YOU to keep Americans as well as world citizens safe from the increase in violence and danger in our world if the regulation of firearms exports from the State Department to the Commerce Department goes through. It would facilitate firearms exports to unstable, oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

PLEASE - Our families are depending on you to not give in to profiteering pressure! All of our lives are worth so much more than to turn our planet into a nightmare of ever-increasing violence - it is bad enough as it is.

PLEASE - if you have a moral, ethical, and spiritual aspect to your being (and I would hope you do), please help protect us from increasing the number of gun sales around the world.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-l5tu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0593

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Congress would have no knowledge of or control over large weapons sales to foreign countries. Commerce Department doesn't have the resources or the expertise to adequately enforce export controls.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-5ojg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0594

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joyce Banzhaf

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## General Comment

Fire arms need to remain classed as military so they may be better regulated.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-478r Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0595

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Michael Lombardi

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-v4wz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0596

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Maxwell Klare

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## General Comment

This change is unacceptable, there is no reason to export our serious gun problems to other countries for nothing more than greed. I am a gun owner who does not like or support the NRA in any way, I am responsible, I took hunters safety over 50 years ago and was taught you kill it you eat it. This philosophy seems to have been lost and replaced with paranoia, that everyone is out to harm you and the solution is to heavily arm you self. I don't want to live in that environment, there is no reason I, or anyone else should be subject to this greedy madness.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-2fvc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0597

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jun Whang

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## General Comment

We strongly oppose this change since it creates a serious risk to our national security by facilitating the export and sale of dangerous firearms to foreign agents.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-wk7s Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0598

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Gregry Loomis

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## General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Thank you for taking action to help make our country and our world a safer place.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-5txu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0599

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Cynthia Merkey

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## General Comment

Should the NRA have carte blanche to push its agenda overseas? Absolutely not. I don't imagine European and other foreign governments want our baggage.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-xhd0 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0600

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Allen Altman

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-qutp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0601

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Laura Sanders

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942p-i3sz
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0602

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joyce Slavik

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## General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-k7lg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0603

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ross & lori Bryant

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## General Comment

What are you idiots trying to do, send us back to the Stone age. It doesn't make any difference who has a gun. Like the saying goes 'guns don't kill people, people kill people's. Looking g at this saying it Dawn's on me that it doesn't sound right. I guess it doesn't matter does it?

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-evfb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0604

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Perry Levin

**Organization:** Amalgamated Limousine

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## General Comment

There are more than enough guns circulating in the population. We do not need more guns; we need more restrictions.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-g4aj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0605

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Janiece Staton

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

The Commerce Department has inadequate staff to be monitoring the flow of firearms into and out of the USA. Thus, dangerous players on the domestic and foreign fronts would have far greater access to the destructive devices they seek. In addition, the shift would eliminate the State Departments Blue Lantern program, that has been in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

Furthermore, it would remove licensing requirements for brokers, increasing the risk of trafficking. Finally, it would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. My Congress members must have direct knowledge and formal input regarding the flow of arms that leave USA soil. The security of my family, neighborhood, nation, and planet depend upon thoughtful, responsible, ethical oversight and monitoring of all weapons of war and extortion. I do not trust military-industrial complex corporations nor the Commerce Department to be effective or reliable in this regard.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-hhb2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0606

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

It seems amazing to me that a president who claims to be creating new immigration barriers under the guise of national security will allow an easier way for fire arms to be sold to foreign buyers. This seems like a move that would make our borders less secure and our nation less secure as well as those around the world than the many innocent families seeking asylum whom are turning away from our borders and imprisoning. This proposed rule is a bad decision for other reasons as well:

- It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
- It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
- It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-6gt2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0607

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** GEORGIA MORGAN

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## General Comment

I oppose this rule change. Switching the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department puts people all over the world at risk, for the benefit of a few gun manufacturers, because the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-3vg6 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0608

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jacqueline Birnbaum

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-vr23 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0609

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rev. Allan B. Jones

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## General Comment

I strongly oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It appears to be a poorly disguised effort to increase arms sales around the world, and lead to more unnecessary deaths and other suffering. Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-9fbt Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0610

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Priscilla Skerry

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## General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

I am very concerned about this tactic by the NRA. It must be stopped...for the safety of our Nation and all of the world's citizens. I expect responsible action be taken to prevent the NRA from getting away with this. Thank you.

Priscilla Skerry  
Portland, Maine 04102

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-1gm1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0611

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Faith Parker

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This would seriously jeopardize national security as well as the security of other free democracies. It would be a decision in favor of big business interest rather than a decision in the interests of safety and security.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-nv9k Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0612

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sherry Monie

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## General Comment

The proposed rule to move the regulation of firearms exports from the State Department to the Commerce Department would be a total disaster and is nothing but a give-away to the gun industry.

This proposal is a bad idea for many reasons, but most important among them are the following. The change would (1) facilitate firearms exports to oppressive regimes, (2) remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and (3) further fuel violence that destabilizes countries and causes mass migration.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-f697 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0613

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joseph Pettit

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## General Comment

I am equally ashamed and appalled that this rule has been proposed. I see no reason why this rule must be changed, but obviously the NRA sees it worthwhile to weaken any gun regulation that it can find. The NRA, however, cannot understand why this rule change will harm us far more than any terrorist plot will.

It will remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, you, the State Department, successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch will remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe. More worrisome is the fact that a savvy gunsmith or a monster of a human being could alter their plans or knowingly provide plans that would allow a firearm to be converted from semi-automatic only into a fully-automatic weapon. The notion that anybody, anywhere, at any time could print a weapon more fit for the military than for civilian usage is extremely troubling. This would allow common criminals to outgun police departments, security forces, and peacekeepers, and it would allow groups such as neo-Nazis, various "alt-right" organizations, and anti-government extremists to possess weaponry that could turn a standoff or a shooting into a literal bloodbath like the one at Mandalay Bay in 2017. For this reason alone, this rule cannot be changed, but there are other rules changes coming that should further drive home reason why this proposed rule cannot be allowed to take effect:

-It will remove licensing requirements for gun brokers, thereby increasing the risk of trafficking;

-The Commerce Department simply does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have the same amount of staff as the State Department's program, which means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents will face far fewer hurdles to obtaining large caches of American guns and ammunition;

-This rule change will eliminate the State Departments Blue Lantern program--which has been in place since 1940, and which carries out hundreds of pre-license and post-shipment inspections and publicly

reports on them, thereby providing transparency to what could easily become a corrupted and dangerous process;

-And finally, Congress will no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. The end result may well be that weapons made by American countries will be turned back upon us during terrorist attacks or military campaigns, and there will be Hell to pay back home if this news ever reaches our shores.

This proposed rule will arm the enemies of democracy, freedom, and peace in one fell swoop--all so that firearms manufacturers can give their CEOs and shareholders an extra bonus when pay day comes around.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942p-ew39
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0614

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Diana Petrauskas

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

This rule change would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

This rule change puts money in gun makers pockets and puts us all in more danger. Dont change the rule.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-g41i Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0615

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kathy Bernard

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

This rule change would make the world a far more dangerous place because:

- It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- It would remove licensing requirements for brokers, increasing the risk of trafficking.
- It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

For all of these reasons, please do not allow the switching the regulation of firearms exports from the State Department to the Commerce Department. Thank you, Kathy Bernard

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942p-w00x
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0616

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Earl Grove

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## General Comment

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

\*\*\*Submit comments now to the State Department and the Commerce Department through the below links. You can write in something like: I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. You can also copy and paste in other parts of this email, too, in order to make your case.

HERES THE LOW DOWN: Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Theres no time to waste - submit comments now to the State Department and the Commerce Department opposing this rule change!

\*When you click through the pages, for your official comments, you can copy and paste the points in this email or use your own voice to make unique comments.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Submit comments now to the State Department and the Commerce Department opposing the rule change.

\*You can copy and paste the points in this email or use your own voice to make unique comments to the State and Commerce Departments.

U.S. Department of State: <https://action.momsrising.org/go/38289?t=10&akid=11004%2E2374855%2EE62M3s>

U.S. Department of Commerce: <https://action.momsrising.org/go/38290?t=12&akid=11004%2E2374855%2EE62M3s>

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Thank you for taking action to help make our country and our world a safer place.

-- Gloria, Kristin, Monifa, Dorie, and the entire MomsRising/Mams con Poder team

[1] Trump move would make it easier for U.S. gun manufacturers to export firearms, The Washington Times, May 14, 2018.

[2] Trump wants to make foreign arms sales easier, The Boston Globe, June 23, 2018.

[3] Ibid., The Boston Globe

[4] American Guns Drive the Migrant Crisis That Trump Wants to Fix With a Wall, The Trace, May 25, 2017.

[5] The Trump administration proposes making gun exports easier. Heres how to submit your public comment on this dangerous proposal, Violence Policy Center.

[6] Ibid., Violence Policy Center.

[7] "U.S. requires group to remove 3-D gun instructions from its website," CNN.com, May 13, 2013.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-ojl6 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0617

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Carol Devoss

---

## General Comment

I oppose changing the rules for regulating fire arms export from the State Department to the Commerce Department for the following reasons:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-ld7h Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0618

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

The NRA and gun manufactures are ugly examples of corporate greed at its worst. Arm more people that should not have access to firearms and make the world an even more dangerous place. Sounds very smart. (Sarcasm)

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-ft44 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0619

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jamilah Elder

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## General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The rule change would make the world a far more dangerous place:

- It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- It would remove licensing requirements for brokers, increasing the risk of trafficking.
- It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Thank you,  
Jamilah Elder

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-91ju Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0620

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Michael Beeston

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-8fv2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0621

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Cathy balan

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## General Comment

I am so against this, it is a dangerous, unnecessary move guidng by greed. THIS SHOULD NOT HAPPEN

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-thg0 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0622

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I strongly oppose the change of rules governing who may make international arms sales in the U.S. Arms should not be considered just another item in the overall commerce of the nation. Lives are at stake and the risks associated with arms sales should be managed with the nation's safety in mind, not the profit of those who would exploit this potential option for personal gain.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-8006 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0623

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kathryn Kram

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## General Comment

I oppose the transfer of regulations that control the sale of firearms from the Department of State to the Department of Commerce. This is not in keeping with national security and might allow arm sales to regimes that are dangerous.

Please stop this transfer!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-7i5k Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0624

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Lynn Frederiksen

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## General Comment

I completely OPPOSE the effort to move the regulation of arms sales from the state department to the department of commerce.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-urjp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0625

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Brigid Murphy

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## General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

The rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-idom Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0626

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Bruce Adolphe

---

## General Comment

If this change goes through, extremely dangerous military-grade automatic weapons could be easily sold to terrorists, US enemies, and just about anybody with money. This is a recipe for uncontrolled, undeclared war, horrible violent crimes, and disaster. This would remove licensing requirements and open the floodgates for unheard of violence. We have a chance to halt this dangerous move. Stop them now,

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-nsud Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0627

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose gun sales being switched to the commerce department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-3k4s Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0628

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rev. Alison Hyder

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## General Comment

I am horrified by the proposal to change the oversight of US arms sales. I believe that this department is the best agency to monitor the destination of all dangerous arms. Please do not allow the U.S. Commerce Department to manage something this crucial to national security.

Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-s2m9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0629

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Angela Gantos

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## General Comment

I oppose this rule change.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-23xk Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0630

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Eileen Battles

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-x430 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0631

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Pat Blair

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## General Comment

Your support for weapons of war in the hands of private citizens and the NRA is unconscionable and egregious!!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-7dmc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0632

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** tia pearson

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

This makes it so much easier for home-grown terrorists to work with foreign countries without any oversight. The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-h40g Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0633

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Robert Hunyady

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## General Comment

I am against this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-kjy8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0634

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Martha Thomae

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## General Comment

To take the sale and foreign distribution of highly lethal firearms out of the regulation and oversight of the State Department and place it under the capitalistic Commerce Department which has neither the staff, nor the experience, nor the will to exercise any control over the amounts and kinds of person killing machines that are allowed to be sold to foreign countries is potentially very dangerous to the safety and welfare of our citizens, home and abroad. We could easily be arming those who wish to destroy our nation and would use these against our citizens when they are in other countries.

Firearms are dangerous enough they should have to undergo serious inspection and regulation whenever they are sold. The greed of a few should not be allowed to jeopardize the safety of many. That is not the way a successful and developing nation handles commercial activities. It is irresponsible.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-frdk Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0635

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mark Cederholm

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-5ru9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0636

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nikki Sachs

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. I am against this change.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-zacj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0637

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kacie Shelton

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## General Comment

Please do not switch firearms regulation from the State Department to the Commerce Department. The Commerce Department does not have the funding to investigate thoroughly.

There is no need to eliminate working programs, such as the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Ultimately, switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration -- in turn overwhelming other US programs and organizations. This is a self-defeating proposal; please reject it.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-z9lp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0638

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Alice Pfister

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. I respectfully request that you do not allow this change to take place. Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-8911 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0639

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Judith Heinle

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## General Comment

I am opposed to the NRA or gun industry selling automatic weapons to foreign governments or individuals of foreign nations. This is not in our best interest as far as the security of our citizens.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-uf85 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0640

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Diane DiFante

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## General Comment

Arms sales should stay under the department of state for national security reasons. State understands who our friends and enemies are and how gun sales could be turned against us.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-in07 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0641

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joseph Homstad

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## General Comment

Do not shift these actions to the U.S. Commerce Department. This would be dangerous. This is the responsibility of the U.S. State Department and should remain so.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-qqcs Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0642

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nataliya Gurshman

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-dnm1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0643

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Morgan Clark

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## General Comment

I object to this proposal and demand that weapons exports continue to be treated as military armaments. The proposal would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them, would remove licensing requirements for brokers, increasing the risk of trafficking, and would remove the State Departments block on the 3D printing of firearms. I demand this proposal be rejected.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-r1rb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0644

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Barbara White

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## General Comment

Please do not move regulation of arms exportation from the State Department to the Commerce Department. It would increase trafficking, make our nation and others less safe, and make us more vulnerable to terrorism

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-7klv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0645

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Louis Brendan Curran

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## General Comment

Oppose this very strongly - firearms are not t-shirts or soybeans - sales require much much more political regulation and oversight than Commerce would give them - block this NRA end-run immediately!!!!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-e5ie Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0646

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-py2b Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0647

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kerry Driscoll

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## General Comment

Do not transfer oversight of weapons exports to the commerce department. It is not commerce, it is war materiel.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-uuv7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0648

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Wayne & Roberta Wunderlin

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## General Comment

I OPPOSE THIS RULE CHANGE THAT WOULD SWITCH THE REGULATIONS OF FIREARMS EXPORT FROM THE U S STATE DEPT. TO THE U S COMMERCE DEPT. THIS WOULD BE MUCH MORE DANGEROUS FOR PEOPLE EVERYWHERE !!!!!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-kges Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0649

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Tom S

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It does not make for a safer world, but simply lines the pockets of gun makers.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-5azs Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0650

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** nick burns

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## General Comment

I do not support the rule change to switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

This is bad policy, which would increase gun trafficking, and eliminate appropriate Congressional oversight

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-l09m Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0651

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Margaret Dunn

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## General Comment

switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-i5nd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0652

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Charles Wright

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## General Comment

If you play Twisted Metal 4 and you want weapons & freeze (99 of everything, including lightning) the first cheat you must enter at the password box is: Down, Start, R1, Up & start

second cheat is: O < ^ R1 and O

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-8olr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0653

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** john north

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## General Comment

I absolutely oppose any rule change that switches the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-o0qb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0654

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Glenn Williams

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. My main concern is that if weapons are no longer classified as "military" under the Commerce Department, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Also, the Commerce Department does not have the resources to adequately control export laws.

I urge you not to allow this rule change.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-1g5j Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0655

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elapully Ganapathy

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## General Comment

Please do not allow control of fire arm sales from State Department to Commerce department. Such a change would have detrimental effects as below.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-n6gx Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0656

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-khmt Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0657

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jessica Rettig

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## General Comment

I am writing to strongly object to the proposed changes in the United States' proposed rule on International Traffic in Arms Regulations.

Right now, firearms exports are classified as military. This is why firearm exports are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.

If the regulation of firearm exports is changed to regulation by the Department of Commerce, then firearms will spread across the world and firearms will find their way back into the United States, where they can be used against innocent children. In fact, if the Department of Commerce is in control of firearms exports, then Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns.

Please do not shift control of firearms exports to the Department of Commerce. Such a move will generate bloodshed across the globe and here at home in America. We must avoid such a future and prevent more gun and firearm violence.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-mg1w Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0658

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Karen Jacques

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## General Comment

I am totally opposed to the proposed rule change the would transfer the export of guns from the State Dept. to the Dept. of Commerce. Currently Congress has the ability to block the sale of large batches of guns to foreign countries. If foreign gun sales end up under the Dept.. of Commerce, Congress won't even know about them. The U.S. already exports far too many weapons which often seem to end up in the hands of terrorists and criminals. The last thing the world needs is for the U.S. to export still more guns to still more terrorists an criminals. This proposed change is just another giveaway to gun manufacturers who don't care about anything except profits. It is utterly irresponsible and will result in countless unnecessary deaths. I am appalled that the federal government is even considering this,

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-pxkn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0659

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Thomas Keys

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer,

anywhere, to  
produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of  
firearms in the U.S.  
and around the globe.

Again, as a citizen of the United States, I oppose this rule change that takes regulatory control from U.S.  
State Department  
and transfers that control to the U.S. Commerce Department

Sincerely,

Thomas J. Keys

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-5srq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0660

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elizabeth Claman

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## General Comment

I strongly oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department for a number of reasons. One, it would reduce needed oversight of gun sales and open the way for more bad actors (such as immoral dictators, terrorists, mob bosses, violent criminals, the insane, etc.) to easily access large numbers of weapons that could be used against innocent people. Two, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Three, frankly, the Commerce Department just does not have the resources to adequately enforce export controls on weapons or much else. Its Bureau of Industry and Security does not have staff in all the places where it would be needed, which means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer barriers to obtaining large supplies of American guns and ammunition. Finally, it would clearly make things a lot scarier for people all over the world!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-ggjn Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0661

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Teresa Nicola

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## General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Thank you for taking action to help make our country and our world a safer place.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-3il2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0662

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Maryann Smith

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. . The Commerce Department just does not have the resources to adequately enforce export controls. The Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. The rule change would make the world a far more dangerous place: It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them. It would remove licensing requirements for brokers, increasing the risk of trafficking. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-sxqd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0663

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Susan Dunham

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

- It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- It would remove licensing requirements for brokers, increasing the risk of trafficking.
- It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-eja7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0664

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jennifer Haefeli

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## General Comment

I oppose this rule change that would switch the regulations of firearms exports from the U.S. State Department to the U.S. Commerce Department.

Among other things, this rule change would:

- \* eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- \* remove licensing requirements for brokers, increasing the risk of trafficking.
- \* remove the State Departments block on the 3D printing of firearms, effectively enabling 3D printing of firearms in the U.S. and around the globe.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-b1sd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0665

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** David Kornreich

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## General Comment

\*\*\*Submit comments now to the State Department and the Commerce Department through the below links. You can write in something like: I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-5ucu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0666

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Debra Krajec

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-3ffe Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0667

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Carmen Nichols

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## General Comment

Details on how the rule change would make the world a far more dangerous place:

- 1.It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- 2.It would remove licensing requirements for brokers, increasing the risk of trafficking.
- 3.It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

This in no way helps with gun violence. When are we going to work on that? When will the lives of people be more important than the sales of weapons?

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-polg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0668

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** walter garvin

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## General Comment

Stop the NRA madness and unfettered access to weapons. Stop the slaughter of children in schools. Stop the slaughter of people in the cinema's. Stop the slaughter of people at shopping malls. Stop it here in the US. Don't allow the NRA to weaponize the world. Enough already.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942p-7mq3
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0669

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** James Vander Poel

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## General Comment

Every day brings news of another misstep by this administration. This action will not help any situation, except for the thickness of the wallets of arms producers.

The United States has had a reputation for making war without any sense. I know that to be true: I spent time in Viet Nam in the USMC in the late 1960s.

I worry that my grandchildren will not be able to travel freely in the world, as there will be so much more hatred directed towards Americans by all the peoples we have wronged.

Taking the control of arms exports away from the Department of State and the Congress is an egregiously bad decision.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-frjg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0670

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rob Jackson

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## General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

When does the madness stop?

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-mbqd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0671

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** John Wiles

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## General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

<b>As of:</b> November 29, 2018 <b>Tracking No.</b> 1k2-942p-lds7 <b>Comments Due:</b> July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0672

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Deb Stringham

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## General Comment

I am very strongly opposed to moving oversight of international gun sales from the State department to the Commerce department. The gun industry should NOT profit at the expense of our national security!!!!



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-xztx Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0673

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Hope Mays

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. We can't keep people from other countries from coming here and send guns to the countries from which they are seeking refuge.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-5ogf Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0674

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kathy Higgins

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## General Comment

I oppose the proposed changes in the U.S. Munitions List Categories I, II, and III for the following reasons;

1. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.
2. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
3. It would remove licensing requirements for brokers, increasing the risk of trafficking.
4. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Do not change the regulations.

# PUBLIC SUBMISSION

<b>As of:</b> November 29, 2018 <b>Tracking No.</b> 1k2-942p-yseu <b>Comments Due:</b> July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0675

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** C. Flannery

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It is VERY important that the state department be fully aware of the sale of large quantities of firearms. There should also be a limit on how many firearms are sold each year. The world needs less guns not more!!! The guns that are made should only be in the hands of people with extensive training.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-g0su Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0676

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Edward Laurson

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## General Comment

Encourage gun safety law and strong gun control laws.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-pfq8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0677

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Julie Blum

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## General Comment

I oppose the rule change. Firearms exports should continue to be classified as military.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-u8uu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0678

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** EVE ILSSEN

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.[

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

So I ask: ARE YOU OUT OF YOUR MINDS?

JUST SAY NO.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-628c Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0679

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ken Box

**Organization:** Austin Community College

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-s08y Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0680

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** karen toscos

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This is a ridiculous change. You are supposed to safeguard the nation against gun violence, instead you are supporting it in a backhanded way.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-2jz5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0681

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I am writing to express my opposition of switching the regulation of firearms exports from the State Department to the Commerce Department. This change would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. I believe we currently have too few regulations over firearms in our country and in our international relations, and do not feel like this is the correct direction to take our arms regulation.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-t064 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0682

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Alix Keast

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## General Comment

I oppose this rule change, moving international gun sales oversight from the State Department to the Chamber of Commerce, who will promote more gun sales to individuals overseas, including machine gun style guns- which are not appropriate for US non-military or any other non-military population to own. This is not a good idea for anyone except gun sales corporations. Please do not pass this dangerous legislation.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-b84z Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0683

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Cause Haun

**Organization:** MomsRising

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It would mean that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-weeps Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0684

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Richard Booth

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## General Comment

Please keep approval of firearm exports in the State Department. Don't approve this rule change.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-gxbg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0685

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Donald Walsh

**Organization:** individual

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-25i7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0686

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joan Hemm

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## General Comment

I oppose the rule change that would switch the regulation of firearms export from the US State Department to the US Commerce Department. We need FEWER guns in our nation and around the world, NOT more!!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-t1cx Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0687

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sandi Cornez

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## General Comment

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7].

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-3x25 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0688

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Daphne Wong

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## General Comment

switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-40k6 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0689

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** BHASKAR DASGUPTA

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The rule change would make the world a far more dangerous place in at least the following manner:

- a. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- b. It would remove licensing requirements for brokers, increasing the risk of trafficking.
- c. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-r0k9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0690

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Victoria Meguid

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## General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

Congress should know when large amounts of firearms are being sold to other countries. guns go to Mexico illegally and look what has happened there- thousands of deaths in the last year with American guns.

Just like many of the other changes in this country in the last 18 months this is dangerous this is not what we should be doing to keep a peaceful world. it is just lining the pockets of the gun makers.

Be responsible.

Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-v0nb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0691

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Margaret Silvers

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## General Comment

I strongly oppose the change in regulation that would mean Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942p-ub16
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0692

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** George Cleveland

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The rule change would make the world a far more dangerous place:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-db9g Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0693

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Wendy Wright

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-ph6a Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0694

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** David M. Dunn

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## General Comment

I do not care what lies are being shoveled at you by #45, the N.R.A., or the republicans.

The proposed change to allow an agency devoted to commerce to do this is reprehensible, wrong, and in the long run foolishness that will hurt our country.

Don't do this!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-z14t Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0695

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nancy Keith

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## General Comment

I oppose this rule change. It would switch the regulations of firearms export from the U.S. State dept. to the Commerce dept. T

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-c9vx Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0696

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Brooke Berman

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## General Comment

I am horrified to learn that the government is thinking of switching the regulation of firearms exports from the State Department to the Commerce Department. This would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. It is not in our best interest as Americans; we already have a massive gun problem, let's please not turn that into a free market issue but instead keep our focus on public safety.

As the mother of a seven year old child, I find myself having to explain guns and gun violence constantly because EVERYWHERE WE TURN there is some slick ad featuring a character with guns. Guns are not "Business as Usual" commerce; they should be handled like a controlled substance.

Thank you.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-4fyf Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0697

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Barbara Harper

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## General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-rua9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0698

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sheilagh Creighton

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## General Comment

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

1] It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre- license and post-shipment inspections and publicly reports on them.[5]

2] It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

3] It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-l062 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0699

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** CURTISS DURAND, MD

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## General Comment

MOST GUNS ARE MEANT TO HARM PEOPLE. INJURE AND KILL THEM. THIS IS WRONG. JESUS WAS THE WORLDS GREATEST PACIFIST. THIS TRUTH HAS UNIVERSALLY BEEN NEGLECTED AND EVEN DENIED.

GUNS AND BOMBS SHOULD BE OUTLAWED NOT MADE EASIER TO DISPLAY AND DISTRIBUTE AROUND THE GLOBE.

IKE KNEW THIS AND WARNED THE WORLD ABOUT THIS DANGER WHILE HE WAS STILL PRESIDENT.

OUTLAW GUNS AND BOMBS. STOP THEIR DISTRIBUTION.

CURTISS DURAND, MD

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-7ymu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0700

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

The State Department should by all means retain the authority to handle export licenses of semiautomatic assault weapons and other powerful firearms. The transfer of that authority to the Commerce Department would kill a program that carries out post-shipment & pre-license inspections, eliminate licensing requirements that hamper trafficking, and open the way for anyone to make 3d printed weapons. Also, the State Department alone can give notice to Congress to block weapons sales that could jeopardize our security. For all these reasons, the proposed transfer should be abandoned, as it would make us considerably less safe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-txn9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0701

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Beth Huizenga

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## General Comment

Oversight of firearms should not be switched to the Department of Commerce from the State Department. This would mean a lack of safety for the American people in the case of a national emergency as the Commerce Department does not have the ability to stop the delivery of arms to those who should not have them, nor the finances to do so.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-trnr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0702

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Steven Van Grouw

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## General Comment

I am vehemently opposed to changing control of international sale of arms from the State Department to the Commerce Department because switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-stp6 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0703

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Tim Miller

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-xcia Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0704

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Donna Pope

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## General Comment

I object to this change based on the fact that the Commerce Department does not have the resources to adequately enforce export controls & the Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations & other violent and dangerous agents would face fewer obstacles to obtaining large supplies of American guns and ammunition.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-ts62 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0705

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Isaiah Plovnick

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## General Comment

I vehemently oppose this irresponsible, unethical, and frankly amoral rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-asmg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0706

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joyce Dixon

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## General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-ski4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0707

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mari Mennel-Bell

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## General Comment

I very much oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department!

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-ukwd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0708

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jeremy Becker

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## General Comment

Absolutely not. The oversight for the sale of firearms and other weapons of destruction must not be shifted to an administrative organization setup to promote said sales. I do not approve.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-sdbe Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0709

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nancy Shane

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## General Comment

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-aqby Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0710

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Deb Stringham

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## General Comment

I am very strongly opposed to moving oversight of international firearms sales from the State Department to the Commerce department. To do so would seriously weaken our national security and that of the world in general. Among other things, it would be a terrible idea to no longer have the State Department's ban on making weapons via 3D printing. State Department, please do your job and protect us.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-do3t Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0711

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Do NOT change the rules.

Keep the authority with the U.S. State Department

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-xmlz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0712

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Christopher Weston

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## General Comment

Do not change this rule. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-n8l1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0713

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Karen Davis

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## General Comment

America has the highest number of guns--and gun deaths--of ANY developed country in the world. Mass shootings are becoming commonplace, to the horror and embarrassment of every logically thinking, peace-loving citizen. WHY in the world would we want to export our PROBLEM to the rest of the world? NO--the NRA. . . and American gun manufacturers . . . should NOT have the ability to architect the demise of our fellow human beings. NO LEGALIZED GUN TRAFFICKING!!!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-1efy Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0714

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Virginia Jastromb

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## General Comment

Do not change arms enforcement from the State Department to the Commerce Department. The Commerce Department does not have the means to prohibit sales to countries that should not have American weapons.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-sji8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0715

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joan Glasser

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-ajpj Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0716

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nina Diamante

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## General Comment

Make all guns sales in U.S.A. illegal, huge fines for selling or buying guns with huge jail sentences for manufacturing, selling or buying guns. Also illegal to buy or sell ammunition. We have had enough children & people killed or maimed in this country and in schools.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-8ell Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0717

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sandra and Bruce Seaton

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## General Comment

I am strongly opposed to gun sale regulations being transferred to the department of commerce.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-tnti Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0718

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anna Feldman

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## General Comment

To Whom it may concern:

There is a push to transfer control of firearms to the Department of Commerce which does not have the resources to oversee the transfer of these weapons particularly if they are allowed to be sold in other countries. Our country's security would be at risk once these weapons leave our boundaries. Below are several other very important reasons why this transfer should not happen.

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-7x0c Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0719

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Terrence Verigan

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## General Comment

Firearms are dangerous. I oppose the proposed changes in the U.S. Munitions List Categories I, II, and III for the following reasons;

1. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.
2. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
3. It would remove licensing requirements for brokers, increasing the risk of trafficking.
4. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Do not change the regulations.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-kwuf Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0720

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joe Buhowsky

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## General Comment

All firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-37tk Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0721

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Stefanie Angsioco

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## General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942p-stx2
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0722

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** M Timmins

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## General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-zdt5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0723

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sara Thompson

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## General Comment

I oppose the proposed change of oversight for export sales of military weapons from the US Senate to the Commerce Department.

I believe the Senate is the proper regulator for this important responsibility. Oversight of military weapons is first and foremost about security and human lives, not about a commodity.

Thank you,  
Sincerely  
Sara Thompson

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-6y9r Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0724

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jack Stansfield

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-snmy Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0725

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Elise Margulis

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## General Comment

It's a very bad idea to eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[]

Removing licensing requirements for brokers will increase the risk of trafficking.

Removing the State Departments block on the 3D printing of firearm is a terrible plan. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Sincerely,  
Elise Margulis

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-5qvm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0726

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Raymond Zahra

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-1lv5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0727

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

We do not need more guns ANYWHERE in the world. The State Department is more likely to look out for our national interest than is the Commerce Department. Gun dissemination should not be seen as a money-making enterprise. The State Department should retain whatever control it has.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-nuvc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0728

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Debra Cunningham

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## General Comment

I oppose the rule change to allow semi-automatic weapons to be licensed through the department of commerce instead of the state department. The US is already the leader in gun violence and the last thing we need to do is export our problem.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-8icz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0729

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Chip Sharpe

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## General Comment

I am aware that the State Departments Blue Lantern program provides critical controls over arms exports. We cannot allow less regulated sales of weapons to further tarnish the world's view of our nation as a rogue state willing to inflict destruction wherever a market for murderous firearms can be found. Commerce Department does not have the resources to govern international arms sales. Please do not allow current regulations to be weakened.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-1c1z Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0730

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Gina Bates

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## General Comment

I OPPOSE the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Guns are already out of control. We do NOT need any more.

LEAVE THE RULE IN PLACE, UNCHANGED!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-fxbb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0731

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Robert Haslag

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## General Comment

Sir,

I would like to address the proposed rule change on which department should control gun sales. Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Considering the national security interest AND the inability of Commerce to actually handle the job, I propose that doing this would be clearly the wrong thing to do.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-g3y4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0732

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Michele Voigt

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## General Comment

I am in opposition to the Department of State proposal to amend the International Traffic in Arms Regulations (ITAR) to revise Categories I (firearms, close assault weapons and combat shotguns), II (guns and armament) and III (ammunition and ordnance) of the U.S. Munitions List (USML) to describe more precisely the articles warranting export and temporary import control on the USML. Items removed from the USML would become subject to the Export Administration Regulations (EAR).

I strongly oppose the changing the International Traffic in Arms Regulations!!!! I believe it is a national security risk to change the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Firearms exports must remain classified as military and under the regulation of the State Department, so that Congress can block sales of large batches of firearms to foreign countries. Congress must remain automatically informed about sizable weapons sales that it could stop for national security, and to prevent assault weapons being sold to countries where there are serious human rights concerns!

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

I believe that the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-6g8a Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0733

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Zareen Kapadia

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-zlrd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0734

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Donald Harland

**Organization:** Self

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

In addition this rule change would have these dangerous, and reckless impacts on firearm exports.

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

It is vital to the safety of our nation and the world that this rule change is not approved.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942p-r940
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0735

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Don Gentz

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## General Comment

I wish to express my opposition to the rule change that would allow the Commerce Department (focused on promoting American business) --not the State Department (focused on safeguarding our nation) -- to handle export licenses of semiautomatic assault weapons and other powerful firearms. The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. The marketing of these weapons to firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would create many long-term and intractable problems in international relations and imperil lives everywhere. The safety and security of our nation and the marketing of large caches of American guns and ammunition are incompatible. Please do not take part in making the world a more dangerous and violent place.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-ze9y Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0736

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Norman West

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## General Comment

The last thing we need are more guns here or anywhere. We are already drowning in too many guns; most supplied by us, in Yemen and Syria and the USA and everywhere. Now the NRA wants less control, less regulation, more murder and more mayhem.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-f4r8 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0737

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** William White

**Organization:** Retired

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. There should be extremely tight rules concerning any export of guns or weaponry in world increasingly plagued with violence. Please assure such a deadly factor for civilization be treated with the urgency it deserves. Thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-bux7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0738

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Louise Kaufman

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## General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

This change would mean that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-cxla Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0739

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** James McConkey

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## General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-nvas Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0740

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Reetta Raag

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-bd9f Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0741

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Robert Haslag

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## General Comment

Sir,

I would like to address the proposed rule change on which department should control gun sales. Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

Considering the national security interest AND the inability of Commerce to actually handle the job, I propose that doing this would be clearly the wrong thing to do.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-nbvg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0742

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-yk5k Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0743

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Marianne Hunter

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## General Comment

My family and I have just learned the the NRA is lobbying to move regulations of sales from US gun manufacturers from this Department to that of Commerce Dept. This UTTERLY UNACCEPTABLE!

No other nation in the world has a civilian population that is armed as ours is here. Who are the customers for these weapons? Terrorists, paramilitary groups and criminals. Will US weapons be used to kill our own military personnel? To kill our allies and friends? To kill vulnerable population groups? To kill American tourists? Without a doubt!

Putting regulation of weapons sales in the hands of Commerce is a complete renunciation of every effort to control the flow of weapons that can and will be used against Americans ( and other humans)! This is such insanity, it crossed the line to treason, as it aids and abets the enemies of the United States of America.

You must use everything in your power to stop this descent into chaos.  
Sincerely, Marianne Hunter and family



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-mb4k Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0744

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Margaret A Go

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-1r9p Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0745

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Shoshana Serxner-Merchant

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## General Comment

The last thing the world needs is more military style weapons available to more people. These regulations should not be transferred to the Department of Commerce, which is only interested in more sales, regardless of what the results are. The US has enough troubles with the influence of the NRA, where automatic assault rifles are readily available, resulting in mass shootings. Do we really want to export that to the rest of the world and to any terrorist organization out there?

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-j2tu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0746

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** maxine sheets-johnstone

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## General Comment

STOP THE PROLIFERATION OF GUNS AND ASSAULT WEAPONS AND THE  
AUGMENTATION

OF THE GUN MANUFACTURING INDUSTRIES!!!

STOP SUPPORTING THE NRA!!!!

DO NOT SHIFT EXPORT POLICY CONCERNING GUNS FROM THE DEPARTMENT OF STATE  
TO THE DEPARTMENT OF COMMERCE!!!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-5hg3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0747

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Judith Fletcher

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## General Comment

I write to strongly urge you not to move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department, which is focused on safeguarding our nation, to the U.S. Commerce Department, which is focused on promoting American business. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

Keeping firearms exports classified as military allows Congress to monitor and block sales of large batches of firearms to foreign countries. I am deeply concerned that with the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

In addition, I don't believe that the Commerce Department has the resources to adequately enforce export controls.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Specifically,

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The proposed rule change would make the world a far more dangerous place. Please do not put the financial interests of firearms sellers ahead of the safety and well-being of citizens everywhere.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942p-19t6
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0748

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nancy Linder

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## General Comment

Moving the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State

Department to the U.S. Commerce Department is dangerous, reckless, ludicrous, and absolutely irresponsible. This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns and terrorist threats. The U.S.

Commerce Department is for businesses and not capable to manage firearms, and therefore, there would be firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition. The State Department is for national security and firearms are a national security issue. Do not move the handling of export licenses for weapons out of the State Department!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-gf6r Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0749

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Robin Hall

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## General Comment

I oppose this rule change that would switch the regulations of firearms exports from the U.S. State Department to the U.S. Commerce Department. This could cause terrible consequences not only to our country but to the entire world.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-mgpw Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0750

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Vickie Obermeyer

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-e7m4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0751

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Chuck Graver

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## General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-h25u Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0752

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Steven Iszauk

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-jf2o Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0753

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Todd Heiler

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## General Comment

This action is not advised. It will threaten national security by making it easier for terrorists and other enemies to have access to these weapons and to turn those weapons on Americans. The NRA and gun manufacturers have a right to make money, but not if that right endangers national security. Second amendment rights do not trump the right to life and security. National security and personal safety should not be sacrificed for the sake of greed. I speak as a military veteran and as someone who has served in law enforcement and private security. I also hold a Bachelor of Science degree in Criminal Justice. thank you.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-cv5w Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0754

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kata Orndorff

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The Commerce Department is not set up to evaluate if a particular sale could be dangerous to our country. Please do not make this rule change.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-zml5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0755

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Eric Meece

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## General Comment

The NRA wants gun companies to be able to sell more semi-automatic weapons to foreign countries. So they want less effective regulation. Please stop this change. It endangers many lives and our national security. We don't want terrorists to get easier access to these weapons.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942p-c44w
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0756

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sara Shutkin

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The rule change would make the world a far more dangerous place:

- It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]
- It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]
- It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942p-5nm8
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0757

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Shelley Kilbon

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

- \* It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- \* It would remove licensing requirements for brokers, increasing the risk of trafficking.
- \* It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942p-b2mz
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0758

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jamison Haase

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-35qy Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0759

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** mary sherman

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## General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This is jsut looking for more violence abroad and toward our citizens as welll as the peoples of this world. Seriously, how can you even consider this? I am strongly against it.

Mary Sherman

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-1ock Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0760

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Catherine Lambeau

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## General Comment

It is the proliferation of guns including assault weapons that is creating so many mass shootings in this country!!! Any move to make weapons more easily available be passing oversight to the commerce department would just increase the problem!!!!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942p-84c3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0761

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Karri Schlegel

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

This absolutely does NOT make our country safer! It only benefits the firearm manufacturers and sellers. This is not a reasonable or smart change in regulations.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-e2ey Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0762

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Charles La Rosa

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## General Comment

I am opposed to changing the purview of firearms export from the Department of State to the Department of Commerce. It appears that primary purpose of the change, as promoted by the NRA, is to loosen the restriction on the export of firearms including military-style semi-automatic weapons.

One of the primary reasons that individuals and families from Central American countries seek to gain asylum in the U.S. or to enter illegally is for personal safety and to escape the high levels of crime and violence in their countries of origin. A large percentage of the weapons used illegally in these countries are sourced in the U.S. They are smuggled into these countries from the U.S. through the efforts of unlawful and unscrupulous gun dealers and criminals.

So, as we attempt to stem the flow of asylum seekers and migrants, both legal and illegal, from these countries, we are at the same time contributing to the conditions that spur them to leave their homes.

I do not see how the transfer of oversight from State to Commerce will improve the current situation, which is what we should be doing, and not making a bad situation even worse.

Such a transfer would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

I strongly urge you not to make this change and thereby make it easier for gun to move out of the U.S. into the hands of criminals and criminal gangs in Central America and other countries.

Please see references below.

[1] Trump move would make it easier for U.S. gun manufacturers to export firearms, The Washington Times, May 14, 2018.

[2] Trump wants to make foreign arms sales easier, The Boston Globe, June 23, 2018.

[3] Ibid., The Boston Globe

[4] American Guns Drive the Migrant Crisis That Trump Wants to Fix With a Wall, The Trace, May 25, 2017.

[5] The Trump administration proposes making gun exports easier. Heres how to submit your public comment on this dangerous proposal, Violence Policy Center.

[6] Ibid., Violence Policy Center.

[7] "U.S. requires group to remove 3-D gun instructions from its website," CNN.com, May 13, 2013.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-xu26 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0763

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** mary sherman

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## General Comment

I strongly oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This is jsut looking for more violence abroad and toward our citizens as welll as the peoples of this world. Seriously, how can you even consider this?

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-pax7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0764

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sheila Kojm

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## General Comment

The State Department should continue to regulate the sale of arms outside of the US. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

My additional concerns are that this switch would:

- \* eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
- \* remove licensing requirements for brokers, increasing the risk of trafficking.
- \* remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

The State Department should please continue to do its job of regulating arms sales to keep America safe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-uv1e Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0765

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Debra Kaplan

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## General Comment

No new permissions to allow international traffic in Arms regulations: US Munitions List Categories I, II,, and III. This is dangerous to public safety.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-o6ps Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0766

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

t switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-sslw Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0767

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** PATRICIA SYKES

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## General Comment

I vehemently oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. This change would enrich gun manufactures at the expense of innocent people across the world.

There is already so much violence in the world, so many repressive governments, terrorists groups, drug cartels, organized crime and the like that use guns to kill, maim, and terrorize. Why would we want to make it easier for the bad guys to get weapons while simultaneously reducing oversight and tracking?

Who benefits from this change? Why is this change needed? What is the rationale behind this change?

The State Department is responsible for safe-guarding our nation; their goal should be to restrict access to military-grade weapons. On the other hand, the Commerce Department is responsible for promoting American businesses; their goal would be to promote American weapons.

What happens when military-grade weapons end up in the hands of rebels who then stage a coup in a foreign country? If we allow that to happen, we are responsible for the fallout.

There are currently more refugees world-wide than at any other time since the aftermath of WWII. Making it easier to obtain military grade weapons will result in more violence, more bloodshed, more human rights violations, more political violence, and more refugees.

Congress should be participating in the efforts to make America safer. How can they do so without oversight or knowledge of where military grade weapons are going?

I urge you to consider the consequences of this rule change.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-k83n Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0768

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joyce Lewis

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## General Comment

We need stricter gun regulation, not opening doors to more guns. Truly, how many guns are enough??? I say none!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-niye Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0769

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Catherine Kennedy Riggs

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## General Comment

I am writing in opposition of changing the regulations regarding the export of firearms. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

Firearms manufacturers should not be allowed free reign in the distribution of their product due to the dangerousness posed to populations worldwide.

[1] Trump move would make it easier for U.S. gun manufacturers to export firearms, The Washington Times, May 14, 2018.

[2] Trump wants to make foreign arms sales easier, The Boston Globe, June 23, 2018.

[3] Ibid., The Boston Globe

[4] American Guns Drive the Migrant Crisis That Trump Wants to Fix With a Wall, The Trace, May 25,

2017.

[5] The Trump administration proposes making gun exports easier. Heres how to submit your public comment on this dangerous proposal, Violence Policy Center.

[6] Ibid., Violence Policy Center.

[7] "U.S. requires group to remove 3-D gun instructions from its website," CNN.com, May 13, 2013.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-vymu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0770

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Those wanting to make this change seem to have lost all sense of conscience and moral values.

We need to be reducing proliferation of gun sales rather than increasing them which this proposal would do.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-hjk9 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0771

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Dan Richman

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## General Comment

Please do not switch gun sales oversight to the Dept of Commerce, which might open the world market to massive US gun sales. The world is quite violent enough.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-nljq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0772

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Michael Gnat

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## General Comment

I vehemently oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department, thereby greatly weakening Congressional oversight of overseas arms sales. There are more than enough wars going on right now, and the US should not be in the business of creating more, or expanding the ones we have. There's much at stake in this world besides CORPORATE PROFITS!



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-6jne Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0773

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Karen Sullivan

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## General Comment

How much will Trump make on this horrible idea?

Do NOT do this. NRA makes enough money.

We do NOT need more guns in the world.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-puz6 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0774

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Keith MaCuk

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-o20i Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0775

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Yvonne Moody

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## General Comment

Please keep gun sales under the department of State, not Commerce.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-3zv7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0776

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Patti Buchanan

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. I feel the State Department needs to know what is happening with all weapons.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-asev Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0777

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Judy Bierbaum

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## General Comment

We do not need to export our insanity and infatuation with guns

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-brqr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0778

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Pamela Rogers

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## General Comment

We've got enough people killing one another! I don't think we need to export more guns carte blanche, with no oversight. Definitely not!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-yljs Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0779

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Timothy Stoltzfus-Dueck

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-sx7k Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0780

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Charles Wolfe

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## General Comment

Please do all possible to keep weapons classified as military equipment and under your jurisdiction, especially export of same. They should not be treated as ordinary "good" for sale worldwide. They should not be under control of the U.S. Commerce Department as they are not like any other items under control of the Commerce Department.

Thank you in advance for considering my statement.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-x9lk Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0781

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Charmagne Haight

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942q-2t77
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0782

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ann Khambholja

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries.[2] With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.[3]

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business).[1] This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-nkxq Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0783

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kathleen Burt

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Commerce is too interested in making sales without the regulations that help keep these firearms out of the hands of oppressive regimes, organized crime, and potential terrorist organizations.

I want to keep the safeguards at work in the US State Dept. where there is more interest and personnel to follow the regulations that have been set up.

I do not want to make it easier to export weapons and esp. not have firearms regulated by the Dept of Commerce.

I urge you not to make this change.

Sincerely,

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-lw18 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0784

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Grace Dunlevy

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-u9qg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0785

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Linda Schiffer

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## General Comment

STOP this insane spread of fire arms before there is open warfare in the streets of every global city. We don't need more guns. We need more gun control! Just how many people have to die at the hands of maniacs brandishing every type of gun...including assault weapons?!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-cc6t Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0786

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Margaret Pierson

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## General Comment

I urge the Commerce and State Departments to oppose relaxing rules that would make it easier for U.S. firearm manufacturers to export assault rifles and other guns, with less oversight and accountability. With gun violence killing 1,000 people around the world every day, we should be making it harder, not easier, to export U.S. made weapons of war.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-3dfm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0787

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Julie McCord

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## General Comment

Classifying our weapons as "commerce" rather than "military" for foreign sale sounds like a wonderful way to get lots more weapons into the hands of our enemies.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-7ld5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0788

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Carol Hirth

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## General Comment

I oppose switching regulation of fire arms exports from the State Department to the Department of Commerce. This could lead to the wider spread of arms and ammunition to bad players throughout the world.

Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-p3jk Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0789

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Alicia Frecker

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## General Comment

Letting the sale of guns across our national borders be classified as purely "business" (e.g., Commerce) rather than an issue of both foreign and domestic safety is ridiculous. It is pure greed and lacks common sense. I strongly oppose it.

Thank you, Alicia Frecker

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-i4ru Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0790

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Julia Colingsworth

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## General Comment

I strongly oppose moving the export of weapons from the State Department to the Commerce Department. This would make it more possible for dangerous regimes to purchase assault weapons.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-j6uv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0791

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Arlene Smith

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-wtsr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0792

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Eric Mattei

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942q-wqw0
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0793

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sasha Kay

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## General Comment

I oppose this rule change because it would mean that Congress is no longer automatically informed about sizable weapons sales, even to countries where there are serious human rights concerns. That would prevent Congress from knowing enough to block sales of large batches of firearms to hostile countries.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-zslr Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0794

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Troy West

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-9c2t Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0795

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Peter Gellatly

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## General Comment

Aloha,

I am writing to request that oversight of firearms exports remain with the U.S. Department of State, rather than shift to the Department of Commerce. There are numerous reasons for this, but chief among them is common sense. Commerce is charged with selling things. The Department of State has a loftier purpose, and within its purview is public safety, here and abroad.

Shifted to Commerce, guns become just another commodity, regardless of their deadly purpose and impact. At State there is civility and restraint, plus rigid guidelines honoring American responsibility.

Surely Commerce has better options for would-be customers than those very items that bring such pain and suffering to our own citizens.

Thank you very much.

aloha, Peter Gellatly

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-z4de Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0796

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Tim Barrington

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## General Comment

To Whom It May Concern,

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Thank you for your consideration.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-opdl Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0797

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** John MacDaniel

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## General Comment

BAN TRUMP AND HIS MINIONS OF ARROGANT IDIOTS!

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942q-md55
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0798

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Connie Allison

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-2gtu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0799

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jessica Brewer

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Do not make it easier for the US companies to sell weapons around the world. Weapons are not benign commerce. Weapons Commerce should be regulated more and controlled more, not less.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-7rjs Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0800

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Brian Bodine

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-29pc Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0801

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** John Coughlin

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-wd3o Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0802

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Vonny Eckman

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## General Comment

I understand that SOMEONE wants to change the sales of firearms to other countries from the Dept. of State to the Dept. of Commerce. I am completely against this move and against sales of weaponry of any kind in the first place. After sixteen years of war and MORE, counting my lifetime it's much more than that, we have the audacity to expect other countries to end their war building capacity and NOW we want to make guns a wholesale commodity! Capitalist to the core!

I disapprove highly of this move and I feel the same about a show of force in a stupid military parade!

Thank you for listening and taking action to stop this insanity!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-9idi Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0803

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Wallace Iimura

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## General Comment

I oppose moving the supervision of arms sales from the State Department to the Commerce Department because the Commerce Department is not as well equipped to do the job as the State Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-pbim Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0804

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** DAVID DIEM

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## General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-ermz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0805

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Helene Mayer

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## General Comment

I am submitting this comment in strong opposition to the proposed rule to transfer oversight of small arms (firearms) exports from the State Department to the Commerce Department. This rule would make U.S. exports of small arms far more dangerous by transferring controls to an agency that prioritizes doing business over safeguarding national security.

The NSSF has already bragged that the rule would lead to a 20% increase in American gun exports. We can see the gun lobbys influence in the rules description of semiautomatic assault rifles like the AR-15 as civilian products. Weapons such as these were not designed for personal use; they were designed for battlefield, which is why they are the weapons of choice for mass shooters.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-l3gu Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0806

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Phyllis Scaringe

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## General Comment

To: US Department of State  
With all due respect: we must take a stand against allowing the international Traffic in Arms Regulations: U.S. Munitions List Categories I, II,III.to go forward.  
Sincerely, Phyllis Scaringe

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-rpc5 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0807

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-ndr2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0808

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

Transferring regulations from the state department to commerce would be disastrous: it would open the door for terrorists anywhere to get hold of munitions and to manufacture them via 3D technology.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-8vjp Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0809

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Henry Ickes

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## General Comment

I oppose switching responsibility for the regulation of firearms exports from the US State Department to the US Commerce Department.

- This would eliminate the State Departments "Blue Lantern" program, which has been in place since 1940, carrying-out hundreds of pre-license and post-shipment inspections and publicly reporting on them.
- It would remove licensing requirements for brokers, increasing the risk of trafficking.
- It would remove the State Departments block on the 3D printing of firearms. Background - when Defense Distributed founder Cody Wilson posted online instructions for how to manufacture weapons using 3D printers, the State Department successfully charged him with violating arms export laws - his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms both in the U.S. \*and\* around the globe. At that point, there's no safe place, anywhere.

And, so much for a market for US arms manufacturers when it's possible to make your own untraceable weapon.

Essentially, switching the regulation of firearms exports from the State Department to the Commerce Department would (1) make it easier to provide firearms to oppressive regimes, (2) remove safeguards to help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons (tough enough as it currently is), and (3) further fuel violence that destabilizes countries and causes mass migration. Is that what the United States is - an unscrupulous arms merchant? We criticize other countries for doing this - how is this maintaining high moral ground?

Any \*truly\* religious person would oppose this action.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942q-z848
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0810

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Emily Blank

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Right now, firearms exports are classified as military. This is why they are under the regulation of the State Department, and why Congress can block sales of large batches of firearms to foreign countries. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey.

Meanwhile, the Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-ibby Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0811

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The State Department has the resources and mandate to keep American guns out of the hands of oppressive regimes, international criminals, and terrorists - the Commerce Department does not.

For reasons of national security, the State Department should continue to handle firearms export regulations.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-7hch Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0812

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Dwight Sanders

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms exports would facilitate making weapons available to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. This is too dangerous and must not be allowed!



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-24et Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0813

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sue and John Morris

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## General Comment

We oppose a rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. We need to be moving toward greater control of firearms, which the Commerce Department does not have the ability to do. We are writing in support of a petition drive by MomsRising, who support tighter control of firearms to protect the children.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-tbo7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0814

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Leslie Jagger

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-hln4 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0815

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Richard Patenaude

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## General Comment

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

The rule change would make the world a far more dangerous place because:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-7h9z Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0816

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jennifer Skillicorn

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## General Comment

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less! Please do not move forward with this plan.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-djd3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0817

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Nancy Dorian

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the US State Dept. to the US Dept. of Commerce. The Commerce Dept. has neither the resources nor the staff to adequately enforce export controls. Furthermore, the rule change would remove the State Dept.'s block on 3D print weapons, remove licensing requirements for brokers, thereby increasing the risk of trafficking, and it would eliminate the State Dept.'s Blue Lantern program.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-z6t7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0818

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-hp3z Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0819

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Anonymous Anonymous

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## General Comment

YOU all are disgusting!!!!  
The USSA government has turned into Putin's / NRA entity  
How low can you go????  
It's tragic!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-3sq2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0820

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Ellen Zarter

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## General Comment

What a danger to our country--semi-automatic weapons being exported to Whoever wants to buy them and then using them violently abroad against our friends. This is a horrible idea, one which I urge you to reject in strong terms.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-5kei Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0821

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Catherine Hunt

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## General Comment

The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.[4]

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.[5]

It would remove licensing requirements for brokers, increasing the risk of trafficking.[6]

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.[7]

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-tu8a Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0822

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Joan Tramontano

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration. Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less! PLEASE don't let this happen. It is wrong and will make the world more violent and dangerous than ever. The National Rifle Association has no right to lobby for this outrageous change in United States regulations and policy.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-clu7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0823

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** sam butler

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## General Comment

oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-qjyd Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0824

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Veronica Bourassa

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## General Comment

The rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-4glo Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0825

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Alexis Lavko

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-bprv Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0826

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Meredith West

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-edrg Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0827

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** james talbot

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## General Comment

For security purposes, I am against any rule change that would change the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. Smells real fishy.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-l8tz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0828

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Emily Moran

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## General Comment

I oppose switching the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The state department is focused on the safety of our nation, which is what firearms export should be about, not commerce. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. It would also remove licensing requirements for brokers, increasing the risk of weapons trafficking. Such changes would make our country - and people in other countries - less safe.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-s6to Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0829

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jen Blume

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## General Comment

oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-lb3f Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0830

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rebecca Gillespie

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## General Comment

I oppose this rule change switching the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-slwm Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0831

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Mary Wellington

---

## General Comment

We must keep handling of semi-automatic assault weapons and other firearms under the control of the State Department where safeguarding our nation is the priority. Handling must NOT be moved to the commerce Department which is all about corporate profit.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-ejo3 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0832

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Gaia Cole

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-kulF Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0833

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Richard Thorne

**Organization:** None

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## General Comment

The proposed rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of

pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms

export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-zlaz Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0834

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Sara Addington

---

## General Comment

oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-cn1k Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0835

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rey Diego

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

The NRA and gun manufacturers want guns everywhere, for everyone, not just here in the United States, but around the world. They are pushing hard for a rule change that would move the handling of export licenses of semiautomatic assault weapons and other powerful firearms from the U.S. State Department (focused on safeguarding our nation) to the U.S. Commerce Department (focused on promoting American business). This transfer of authority would open new floodgates for arms sales internationally, with serious implications for our national security. Sensible gun control laws, now.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-z2c0 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0836

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** James John Sheehan

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

It is obvious to me that since Donald J. Trump engineered this change of venue regarding the shipment of firearms to be less regulated implies his desire

to become friends with autocratic governments who he painfully would love to have their admiration. Donald J. Trump needs to

be removed from the office of the President of the United States. He is an immature individual with childish dreams of becoming a King.

He is extremely foolish and unfit to serve....Sincerely , James Sheehan, Laguna Niguel, CA. " May God save our Democracy"!



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-dolw Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0837

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Emily Brandt

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## General Comment

There has been a recent increase in gun violence which might have been impossible. There is no excuse for reducing access to all guns. Having had a neighbor who had PTSD and who often pointed it at my children across the fence. I know the constant fear of an unstable person having a gun. I called police every time this happened, but he always put it away before they arrived. He pointed it at his girlfriend who was standing outside his house, but who refused to press charges because he own mental health was challenged. Average people who have no need to protect themselves from other civilians, do not need to own guns. They do not promote public safety; they heighten fear.

I was married to an alcoholic who insisted on owning a shotgun. Once when he was angry and despondent, he locked himself in a bedroom where the gun was. When I called the police, they ridiculed me for being afraid. They didn't recognize that he was drunk and didn't see him in a fit of rage.

Guns contribute nothing to family safety and security. They bring out the absolute worst in human nature and I urge you to realize that you cannot legislate mental health and stability and it is your responsibility to protect lives. At the moment, Congress is not prioritizing human lives over lobbyists and misguided selfish noisy guns advocates.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-md9c Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0838

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Thane Boden

---

## General Comment

At any time, this notion of essentially completely deregulating the sales of weapons (of any kind) would be a decidedly wrong-minded idea; given our current president, well, its difficult not to argue the outcome could very well be in favor of some of our fiercest enemies. Providing capitalists a way to expand their profit at the expense of international stability is a patently stupid idea.

The move to switch weapons sales from an arena with congressional oversight to one without cannot be allowed. Do not allow the Commerce Department to take control of international arms deals.

Thank you,  
Thane Boden  
Wyoming

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-rbrl Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0839

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Greg Sells

---

## General Comment

I oppose the rule change that would switch regulation of firearms export from the Department of State to the Department of Commerce. Commerce does not adequate staff to adequately enforce export controls, and Congress would no longer be informed about arms sales to countries where there are serious human rights concerns, such as Turkey and the Philippines. In addition, this rule change would eliminate the Blue Lantern program, which carries out pre-license and post-shipment inspections and publicly reports on them, and has done so since 1940. It would remove requirements for brokers to be licensed, as well as a block on the 3D printing of firearms. All of this would make the world a more dangerous place.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-22ek Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0840

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Linda Izzard

---

## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Guns kill people. We need more controls, NOT Less!! Just what we need...a world with more guns.

The Commerce Department just does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-nspb Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0841

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** mia heavyrunner

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## General Comment

Here are more details on how the rule change would make the world a far more dangerous place:

It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.

It would remove licensing requirements for brokers, increasing the risk of trafficking.

It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

<b>As of:</b> November 29, 2018 <b>Tracking No.</b> 1k2-942q-2bvxx <b>Comments Due:</b> July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0842

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Rachel Hubka

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## General Comment

I oppose the rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department.

Switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-8b9x Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0843

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jena Janek

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## General Comment

It is imperative that the rule regulating the export of firearms NOT be shifted from the U.S. State Department to the U.S. Commerce Department.

As it is now, firearms are classified as "military", and so they come under the State Department's control. So Congress can monitor and block large sales of firearms to foreign countries. If firearms were to come under the purview of the Commerce Department, then Congress would not be informed of sales, nor could it stop those sales in the name of national security or prevent those sales to countries where there are serious human rights concerns.

In addition, the Commerce Department lacks the resources to enforce export controls. Its Bureau of Industry and Security does not have the necessary supply of staff members to handle all these controls. As a result, it would be far easier for firearms traffickers, terrorist organizations, organized crime, and other violent persons to secure large amounts of American guns and ammunition.

Switching the regulation of firearms exports from the State Department to the Commerce Department would ease the way for oppressive regimes to secure American weapons, as well as organized crime and terrorist organizations. Putting the regulation of firearms under the Commerce Department's umbrella would simply fuel the violence that destabilizes countries and is the cause of mass migration.

Shifting the firearms exports to the realm of the Commerce Department would result in eliminating the State Department's Blue Lantern program (begun in 1940) which conducts hundreds of pre-license and post-shipment inspections, and makes those reports public. Shifting firearms exports to the Commerce Department would result in the elimination of licensing requirements for brokers, which highly increase the risk of trafficking. Also, placing firearms exports under the Commerce Department would remove the State Department's block on the 3D printing of firearms. Without this block, 3D printing of firearms could happen readily in the United States and around the globe.

Whoever suggested that the export of firearms be shifted from the State Department to the Commerce Department did not think deeply enough into the ramifications of the idea. This must not be allowed to happen.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-5yx1 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0844

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Shari Silverman

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. With the rule change, Congress would no longer be automatically informed about sizable weapons sales that it could stop in the name of national security, even to countries where there are serious human rights concerns, such as the Philippines and Turkey. The Commerce Department does not have the resources to adequately enforce export controls. Its Bureau of Industry and Security does not have staff everywhere. This means that firearms traffickers, organized crime, terrorist organizations, and other violent and dangerous agents would face far fewer hurdles to obtaining large caches of American guns and ammunition.



# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-buw7 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0845

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jeffery Bovee

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## General Comment

Firearms sales must remain classified as military along with any other weaponry.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-c13z Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0846

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jennifer Biswas

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## General Comment

I oppose this rule change that would switch the regulations of firearms export from the U.S. State Department to the U.S. Commerce Department. The bottom line is that switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

We must safeguard the interests of our nation rather than relax regulations for the purposes of making more money for gun manufacturers.

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-16d2 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0847

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Jack David Marcus

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## General Comment

In my opinion, switching the regulation of firearms exports from the State Department to the Commerce Department would facilitate firearms exports to oppressive regimes, remove safeguards that help keep extra-legal agents like organized crime and terrorist organizations from obtaining weapons, and further fuel violence that destabilizes countries and causes mass migration.

I believe the rule change would make the world a far more dangerous place in the following ways:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon.
4. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

# PUBLIC SUBMISSION

As of: November 29, 2018
Tracking No. 1k2-942q-x3wz
Comments Due: July 09, 2018

**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0848

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Derek Gilbert

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## General Comment

I am writing to OPPOSE the proposed rule change that would switch regulations of firearms export to the Department of Commerce. There are MANY reasons for opposing this change. Here are some:

1. It would eliminate the State Departments Blue Lantern program, in place since 1940, which carries out hundreds of pre-license and post-shipment inspections and publicly reports on them.
2. It would remove licensing requirements for brokers, increasing the risk of trafficking.
3. It would remove the State Departments block on the 3D printing of firearms. When Defense Distributed founder Cody Wilson posted online instructions for how to 3D print weapons, the State Department successfully charged him with violating arms export laws, since his open-source posting made it possible for anyone with access to a 3D printer, anywhere, to produce a lethal weapon. The rule switch would remove this block, effectively enabling 3D printing of firearms in the U.S. and around the globe.

Firearms are dangerous. They are used to kill people every day around the world in acts of organized crime, political violence, terrorism, and human rights violations. They should be subject to more controls, not less!

# PUBLIC SUBMISSION

As of: November 29, 2018 Tracking No. 1k2-942q-gm43 Comments Due: July 09, 2018
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**Docket:** DOS-2017-0046

Amendment to the International Traffic in Arms Regulations: Revision of U.S. Munitions List Categories I, II, and III

**Comment On:** DOS-2017-0046-0001

International Traffic in Arms Regulations: U.S. Munitions List Categories I, II, and III

**Document:** DOS-2017-0046-0849

Comment on DOS-2017-0046-0001

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## Submitter Information

**Name:** Kathleen Kaysinger

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## General Comment

I oppose this rule change that would switch the regulation of firearm export from the US State Department to the US Commerce Department.

Message

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**From:** Khawam, Joseph N [KhawamJN@state.gov]  
**Sent:** 12/31/2019 8:57:39 PM  
**To:** PM-Staffers Mailbox [PM-StaffersMailbox@state.gov]; Windecker, Melissa A [WindeckerMA@state.gov]  
**Subject:** RE: Cats I-III AM - Large Files - Tab 3 Attachment 5  
**Attachments:** Tab 3 Att 5e - Public Comments to the Department of State Proposed Rule.pdf; Tab 3 Att 5f - Public Comments to the Department of State Proposed Rule.pdf

Email 3 of 5

Joseph N. Khawam  
Office of the Legal Adviser (L/PM)

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**From:** Khawam, Joseph N  
**Sent:** Tuesday, December 31, 2019 3:56 PM  
**To:** PM-Staffers Mailbox <PM-StaffersMailbox@state.gov>; Windecker, Melissa A <WindeckerMA@state.gov>  
**Subject:** RE: Cats I-III AM - Large Files - Tab 3 Attachment 5

Email 2 of 5

Joseph N. Khawam  
Office of the Legal Adviser (L/PM)

---

**From:** Khawam, Joseph N  
**Sent:** Tuesday, December 31, 2019 3:56 PM  
**To:** PM-Staffers Mailbox <[PM-StaffersMailbox@state.gov](mailto:PM-StaffersMailbox@state.gov)>; Windecker, Melissa A <[WindeckerMA@state.gov](mailto:WindeckerMA@state.gov)>  
**Subject:** Cats I-III AM - Large Files - Tab 3 Attachment 5

I'm not sure what the maximum limit is on emails, so I'm breaking Tab 3 Attachment 5 into five emails.

Email 1 of 5

Joseph N. Khawam  
Attorney-Adviser  
U.S. Department of State  
Office of the Legal Adviser (L/PM)  
2201 C Street NW, Suite 6420  
Washington, DC 20520  
(202) 647-8546 (T, W, T)  
(202) 663-2915 (M)  
(202) 663-3097 (F)  
Opennet: [KhawamJN@state.gov](mailto:KhawamJN@state.gov)

